

Planning Department
City and County of San Francisco

KEARNY STREET/COLUMBUS AVENUE PROJECT

Final Supplemental Environmental Impact Report

94.615E
(FEIR State Clearinghouse #86031123)

Draft EIR Publication Date: September 20, 1996
Draft EIR Public Hearing Date: October 24, 1996
Draft EIR Public Comment Period: September 20 to October 24, 1996
Final EIR Certification Date: December 12, 1996

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Changes from the text of the Draft EIR are indicated by solid dots (●) at the beginning of each revised section, paragraph, graphic or table.

REF 711.4097 K214f

Kearny Street/Columbus
Avenue project : final
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File No.: 94.615E

Assessor's Block 195, Lots 4, 5, 11 & 13

SAN FRANCISCO

CITY PLANNING COMMISSION

MOTION NO. 14253

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR PROPOSED NEW CONSTRUCTION OF 104 UNITS OF LOW-INCOME HOUSING FOR ELDERLY WITH ONE RESIDENT MANAGER'S DWELLING UNIT, A RESIDENT FILIPINO/CHINESE COMMUNITY CENTER, A SCHOOL/CHAPEL/PASTORAL RESIDENCE (ST. MARY'S CATHOLIC CENTER), AND AN UNDERGROUND COMMUNITY COMMERCIAL PARKING GARAGE, LOCATED ON KEARNY AND JACKSON STREETS AT THE NORTHEAST CORNER (LOTS 11 AND 13 IN ASSESSOR'S BLOCK 195, ALSO KNOWN AS SITE A), AND NEW CONSTRUCTION OF 46 UNITS OF MARKET-RATE HOUSING, GROUND FLOOR RETAIL AND PARKING GARAGE LOCATED ON THE SOUTHWEST CORNER OF COLUMBUS AVENUE/WASHINGTON STREET/MONTGOMERY STREET (LOTS 4 AND 5 IN ASSESSOR'S BLOCK 195, ALSO KNOWN AS SITE B).

MOVED, That the San Francisco City Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Supplemental Environmental Impact Report identified as case file No. 94.615E, Kearny Street/Columbus Avenue Project (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et seq., hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that a Supplemental Environmental Impact Report was required and provided public notice of that determination by publication in a newspaper of general circulation on September 6, 1996.

b. On September 20, 1996, the Department published the Supplemental Draft Environmental Impact Report (hereinafter "SDEIR") and provided public notice in a newspaper of general circulation of the availability of the SDEIR for public review and comment and of the date and time of the City

Planning Commission public hearing on the SDEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the SDEIR and of the date and time of the public hearing were posted near the project site by Department staff on September 20, 1996.

d. On September 20, 1996, copies of the SDEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the SDEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on September 20, 1996.

2) The Commission held a duly advertised public hearing on said SDEIR on October 24, 1996, at which opportunity for public comment was given, and public comment was received on the SDEIR. The period for acceptance of written comments ended on November 7, 1996.

3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 48-day public review period for the SDEIR, prepared revisions to the text of the SDEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the SDEIR. This material was presented in a "Draft Summary of Comments and Responses," published on November 27, 1996, was distributed to the Commission and to all parties who commented on the SDEIR, and was available to others upon request at Department offices.

4) A Final Supplemental Environmental Impact Report has been prepared by the Department, consisting of the SDEIR, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses all as required by law.

5) Project Supplemental Environmental Impact Report files have been made available for review by the Commission and the public, and these files are part of the record before the Commission.

6) On December 12, 1996, the Commission reviewed and considered the Final Supplemental Environmental Impact Report and found that the contents of said report and the procedures through which the Final Supplemental Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the State CEQA Guidelines and Chapter 31.

7) The Project Sponsor has indicated that the presently preferred alternative for Lots 4 and 5, the Columbus Avenue/Washington/Montgomery Streets site, is Alternative C: Reduced Housing on Site B Alternative described in the Final Supplemental Environmental Impact Report.

8) The City Planning Commission hereby does find that the Final Supplemental Environmental Impact Report concerning File No. 94.615E: Kearny Street/Columbus Avenue Project reflects the independent judgment of the City and County of San Francisco, is adequate, accurate and objective, and that the Summary of Comments and Responses contains no significant revisions to the SDEIR, and hereby does CERTIFY THE COMPLETION of said Final Supplemental Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.

9) The Commission, in certifying the completion of said Final Supplemental Environmental Impact Report, hereby does find that the project described for Site A, Lots 11 and 13, the Kearny/Jackson Streets site, in the Supplemental Environmental Impact Report and the project preferred by the Project Sponsor for Site B, Lots 4 and 5, the Columbus Avenue/Washington Street/Montgomery Street site, described as Alternative C: Reduced Housing on Site B Alternative in the Final Supplemental Environmental Impact Report:

Will have an unavoidable, project-specific, significant, adverse environmental effect on Historic and Architectural Resources in that it would demolish the Colombo Building which the State Historic Preservation Officer has determined appears eligible for listing in the National Register of Historic Places.

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission at its regular meeting of December 12, 1996.

Linda Avery
Secretary

AYES: Commissioners Antenore, Chinchilla, Lowenberg, Marks, Mills, and Martin

NOES: None

ABSENT: None

EXCUSED: Commissioner Joe

ADOPTED: December 12, 1996

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KEARNY STREET/COLUMBUS AVENUE PROJECT
● FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

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INTRODUCTION

This document is a supplement to the *Final Environmental Impact Report (FEIR) for the Pan Magna Plaza Mixed Use Development* (Case No. 84.533E, certified June 4, 1987). Pursuant to Section 15163 of the California Environmental Quality Act (CEQA) Guidelines, a supplement to an EIR may be prepared when substantial changes are proposed in the project and/or substantial changes have occurred with respect to circumstances under which the project would be undertaken but only "minor additions or changes would be necessary to make the FEIR adequately apply to the project in the changed situation." Since certification, the project has changed from an office/retail project with some housing to a primarily residential project with a school and religious/community uses. The Embarcadero Freeway has also been demolished since the FEIR was certified, with resulting changes in traffic circulation patterns.

In addition, CEQA was revised in 1992 to establish a presumption that demolition or substantial change in an historic resource is a significant environmental effect, requiring preparation of an EIR, and including a definition of an historic resource as one listed in or determined eligible for the California Register of Historic Resources (CEQA Section 21084.1). The Colombo Building has been evaluated by the State Office of Historic Preservation (SOHP) as part of a 1982 North Beach survey, and it has been determined that the building has characteristics that may make it eligible for separate listing in the National Register of Historic Places. As the proposed project continues to propose demolition of this building and as that demolition was not evaluated in the FEIR for historic significance, additional analysis is now needed on this issue, as well as on the revised project and changes in transportation circumstances.

1987 FEIR

The project analyzed in the FEIR was a mixed use development on two sites connected by IIs Lane, a small alley: a 14-story, approximately 165-foot-tall office and residential structure with 96,800 square feet (sq.ft.) of office space, 120 residential units, about 12,100 sq.ft. of retail space, and 54 independently accessible parking spaces (or 108 valet spaces) at the intersection

space, and 54 independently accessible parking spaces (or 108 valet spaces) at the intersection of Kearny Street and Jackson Street (Site "A"); and an eight-story, approximately 94-foot-tall office building containing about 81,300 sq.ft. of office space, about 9,500 sq.ft. of retail space, and about 15 independently accessible parking spaces (or 31 valet spaces) at the intersection of Washington Street, Columbus Avenue and Montgomery Street (Site "B").

Approved Project

The City Planning Commission ultimately approved Alternative G from the FEIR, a 14-story, approximately 130-foot-tall residential structure with 126 affordable units, about 43,300 sq.ft. of retail space, and 155 independently accessible parking spaces at Site A (proposed uses on Site B were the same under the previously proposed project and Alternative G).

Proposed Project

The currently proposed project would amend the previous approval to include the following uses: on Site A, a 15-story, 140-foot-tall residential structure with 105 units (104 of which are affordable), an approximately 59,000-sq.ft. St. Mary's Catholic Center containing a school and chapel, and 156 independently accessible parking spaces; on Site B, there would be a ten-story, 94-foot residential structure exclusive of mechanical penthouse containing about 70 market-rate units, with about 9,900 sq.ft. of retail uses on the ground floor, and about 85 valet parking spaces. The previously approved office building on Site B is an additional option for that part of the project site.

Supplemental EIR

This Supplemental EIR (SEIR) contains a discussion of the changed environmental conditions which occurred subsequent to certification of the 1987 FEIR, the revised project-specific impacts, and the project's contribution to cumulative impacts.

The environmental topics discussed in this Supplemental EIR follow the same categories identified in the FEIR. Information from the FEIR that is still relevant is identified and is incorporated by reference with a summary pursuant to CEQA Sections 21061 and 21100 (see also State Guidelines Section 15160). The environmental setting and impact discussions in the FEIR related to Land Use and Zoning, Urban Design and Site Visibility, Shadow, and Historic,

Historic, Architectural and Cultural Resources are generally unchanged and are applicable to the proposed project. Conditions in the environmental areas of Transportation, Air Quality, Wind, Employment and Housing, and Hazardous Wastes have changed in the past decade since the FEIR was published. These sections of the FEIR have been substantially revised in this Supplemental EIR. The FEIR is available for public review at the Office of Environmental Review, San Francisco Planning Department, 1660 Mission Street, San Francisco, and at the San Francisco Main Library Science and Documents section.

I. SUMMARY

A. PROJECT DESCRIPTION AND SITE CHARACTERISTICS

The Kearny Street Housing Corporation, the Chinese Community Housing Corporation, the Archdiocese of San Francisco, the St. Mary's Chinese Catholic Center and the Pan Magna Group (collectively, the project sponsors) propose to develop affordable senior housing, market-rate housing, a Catholic Center and St. Mary's Chinese School, and parking. The project sponsors' objectives are to provide affordable housing to elderly City residents, to provide community space for the Chinese and Filipino citizenry, to provide a Catholic Center that would contain the replacement St. Mary's School and religious pastoral and social center, to provide market-rate housing with available parking, to provide a parking garage to meet the demand for parking at the Catholic Center and School and generate revenue to help pay for the building and support operations at the Center, and to complete the project on schedule and within budget.

The project would consist of three buildings: (1) a 15-story residential tower at the intersection of Kearny and Jackson Streets with affordable senior housing, (2) a Catholic pastoral and social center, an elementary school, a Chinese language and cultural school, and a parking garage (Site "A"); and (3) a ten-story building at the intersection of Washington Street, Columbus Avenue and Montgomery Street with market-rate residential units, ground-floor retail and parking (Site "B").

The project site is in the nearly triangular-shaped block bounded by Washington Street, Kearny Street, Jackson Street and Columbus Avenue. Site A is on lots 11 and 13 at the northwest corner of the block and Site B is on lots 4 and 5 at southeast corner of the block. The two sites are connected by IIs Lane. The 18,920-sq.ft. Site A is currently vacant. The International Hotel (I-Hotel), which previously occupied Lot 13 of the site, and the smaller Victory Hotel formerly on Lot 11, were demolished in 1979. The approximately 14,060-sq.ft. Site B currently contains a vacant lot (formerly the site of the 70-room Bell Hotel which was demolished in 1979) and the

two-story, 11,600-sq.ft. Colombo Building, which contains below ground-level parking ground-floor retail and second-floor office uses.

The proposed building on Site A would be a 15-story tower on the north end of the site containing 104 units of affordable senior housing and one manager's unit, and several common rooms; and the approximately 59,000-sq.ft. St. Mary's Catholic Center four-story wing on the south end of the site containing about 59,000 sq.ft. with a gym, stage, chapel and multi-use area, school classrooms, library, chapel, pastoral residence, courtyard and roof-top play area. An approximately 154-space parking garage would be on three levels below grade with entrances and exits on Jackson Street. No loading docks are proposed for the project. All loading for the Site A portion of the project would occur in the garage near the elevator or at the curb cutaway in front of the Catholic Center on Kearny Street.

The building on Site B would be about ten stories and would contain about 70 two-bedroom, market-rate residential units and approximately 9,900 sq.ft. of ground floor retail use. There would be a parking garage for about 65 self-park spaces in two levels below grade with access from Washington Street. The main building entrance would be on Columbus Avenue.

The entire project would contain about 164,500 sq.ft. of residential space, 59,000 sq.ft. for the Catholic Center and St. Mary's Chinese School, about 9,900 sq.ft. of retail space, and about 239 parking spaces.

In 1987, the *Final Environmental Impact Report* (FEIR) for the *Pan Magna Plaza Mixed Use Development* (Case No. 84.533E, certified June 4, 1987) proposed a mixed use development: On Site A, a 14-story, approximately 165-foot-tall office and residential structure with 96,800 sq.ft. of office space, 120 residential units, about 12,100 sq.ft. of retail space, and 54 independently accessible parking spaces (or 108 valet spaces); and on Site B, an eight-story, approximately 94-foot-tall office building containing about 81,300 sq.ft. of office space, about 9,500 sq.ft. of retail space, and about 15 independently accessible parking spaces (or 31 valet spaces). This EIR is a Supplemental EIR to the 1987 Final EIR.

The proposed project may be constructed in stages, with the parking garage and housing on Site A to be completed by the end of 1998, followed by completion of the Catholic Center and school in the following year. Site B would also be completed by 1999.

The project would require the following approvals:

- The City Planning Commission must certify the SEIR; amend the existing Conditional Use Planned Unit Development authorization to permit exceptions from certain *City Planning Code* requirements, including rear yard, height, bulk, parking, sun access setback, lot size, street frontage, community garage size, and freight handling; and find the project consistent with the Priority Policies of Section 101.1 of the *City Planning Code* and applicable Objectives and Policies of the *San Francisco General Plan*. The Planning Department must approve demolition and construction permits.
- The Department of Public Works requires that an unobstructed corridor at least 4 feet wide measured from the curb and 10 feet deep be maintained in order that a 10-foot-wide encroachment under the sidewalks surrounding the sites be allowed. Plans will be reviewed by the Department of Building Inspection for compliance with this requirement.
- The Department of Parking and Traffic must approve proposed loading zones (white curbs).
- The Department of Building Inspection must review and approve demolition and construction permits.
- The Department of Public Works' Bureau of Streets and Sidewalks and the Board of Supervisors must review and approve the school drop-off curb cut on Kearny Street for Site A.

B. MAIN ENVIRONMENTAL EFFECTS

LAND USE AND ZONING (Pages 64 to 66)

The historic uses on the sites would not be changed, but the project buildings would be larger than the scale and character of buildings in the surrounding neighborhoods (except for the Financial District), including Chinatown and North Beach.

The proposed uses on Site A would be oriented to the needs of the Chinatown community and would be compatible with other land uses in the immediate area. The proposed uses on Site B would provide housing opportunities for workers in the Financial District, not unlike the Washington/Montgomery Tower located at 555 Montgomery Street, directly across Washington Street from Site B. This would also be considered a compatible land use. The combined development would increase pedestrian activity in the vicinity, due to the increased on-site population and the activities proposed.

The basic Floor Area Ratio (FAR) for the Chinatown Residential/Neighborhood Commercial (CR/NC) District is 1.0:1; the FAR for the Chinatown Community Business (CCB) District is 2.8:1. These FAR limits would not apply to the proposed project, in accordance with Section 124(a)&(b), which provides that in Chinatown Mixed Use Districts the residential and institutional

(school and chapel) portions of the project would be exempt. The underlying FAR of 10.0:1 would apply to the garage and commercial uses.

URBAN DESIGN AND SITE VISIBILITY (Pages 66 and 67)

Construction of a 15-story structure on the vacant Site A, demolition of the two-story Colombo Building, and construction of a ten-story structure on Site B, would alter the scale, facade rhythm, and urban texture of the project block and its vicinity (the same effect noted in the FEIR). The project would represent a departure in form and scale from the existing development on the project block; it would be similar to newer high-rise and mid-rise structures primarily located to the south. The proposed residential tower on Site A would be about three to five times the height of prevailing development on the project block and, in general, throughout the North Beach, Chinatown and Jackson Square districts. The project would step down in height from the Financial District, providing a transition in the scale between the Washington/Montgomery Tower, the Holiday Inn and the 850-foot Transamerica Pyramid, and the six-story 900 Kearny Building and the seven-story Columbus Tower building north of the project.

The project buildings could block some views of occupants in nearby buildings; however, these are private views and not public panoramic vistas. The project would be visible from medium- and long-range view points to the north and west. From Telegraph Hill and Nob Hill, the project would be visible as part of a group of existing high-rise structures of the Financial District. In some short- and mid-range views, the two project structures would alter the small-scale character of the area.

SHADOW AND WIND (Pages 67 to 79)

Due to the existing high-rise buildings near the project site, the proposed project would cast little new shadow during all times of the day and year. The project is designed to cast no new shadow on any property under the jurisdiction of the Recreation and Park Department and would thus not be in conflict with Proposition K, the Park Shadow Ban Ordinance.

The project would cause wind to decrease at six of the 13 locations measured in the wind tunnel. Winds would be unchanged at four locations and would be increased at three locations. Winds would exceed 11 m.p.h. at six locations, where the existing winds already exceed 11 m.p.h. There would be no violations of the 26 m.p.h. hazard criterion.

HISTORICAL, ARCHITECTURAL AND CULTURAL RESOURCES (Pages 80 to 81)

Construction on Site B would require the demolition of the Colombo Building, which is rated "3" in the 1976 Department of City Planning Architectural Inventory, was surveyed by the Foundation for San Francisco's Architectural Heritage and given a rating of "B*," and was recommended by the Landmarks Preservation Advisory Board for San Francisco City Landmark Status in May 1984, but was not formally designated. The building has been deemed potentially eligible for National Register Status as an Historic Building by the State Office of Historic Preservation (SOHP).

Archaeological investigation conducted for the sites indicates the presence of significant cultural resources on both Site A and Site B from the Spanish-Mexican to Gold Rush periods. These resources would be disturbed with the construction of the project.

TRANSPORTATION (Pages 81 to 99)

The proposed project would generate a total of about 4,485 weekday daily person-trips (2,300 for Site A and 2,185 for Site B), and 319 weekday PM peak hour (4:30 p.m. to 5:30 p.m.) person-trips (140 for Site A and 179 for Site B).

The weekday daily and PM peak hour *vehicle*-trip generation was estimated for employees, visitors, and residents of the proposed project. A total of 842 total daily vehicle trips would be generated (405 for Site A and 317 for Site B), of which 101 vehicle trips (74 for Site A and 27 for Site B) would occur during the weekday PM peak hour.

Seven signalized intersections in the project vicinity were studied to determine the potential effects of project-generated traffic, including Broadway/Columbus Avenue, Jackson Street/Kearny Street, Jackson Street/Columbus Avenue, Washington Street/Kearny Street, Washington Street/Montgomery Street/Columbus Avenue, Clay Street/Battery Street, and Washington Street/Embarcadero Roadway. The analysis considered weekday PM peak-hour (4:30-5:30 p.m.) travel conditions at the study intersections under three scenarios (existing, existing-plus-project, and year 2010 cumulative-plus-project). Under existing conditions all seven study intersections operate at Level of Service (LOS) B, an acceptable LOS. The addition of project-generated traffic would increase intersection delays by an average of 0.5 seconds, but would not cause a change

in LOS. Therefore, all study intersections would continue to operate at acceptable levels of service in the weekday PM peak-hour.

Cumulative growth forecasts to year 2010 were based on an annual growth rate of one percent, or 16.1 percent over 15 years. Under cumulative conditions with the project, all study intersections would experience small increases in delays (averaging 1.2 seconds), but all would continue to operate at LOS B in the weekday PM peak-hour, an acceptable service level. This would therefore be considered a less-than-significant impact.

The site is well-served by local and regional transit carriers. Transit stops for approximately 12 MUNI bus lines are within walking distance of the project site, including three at the project block itself. The proposed project would generate approximately 75 transit trips (50 inbound and 25 outbound) during the weekday PM peak hour. Most MUNI lines, whose maximum load points occur near the project site, currently operate near or above peak load factor standards. These lines include 1-California, 9AX-San Bruno 'A' Express, 30-Stockton, 45-Union-Stockton, and 83-Pacific. The project would generate about 41 transit trips (or 55 percent of the total 75 trips) spread among 84 buses on these five lines, which would yield an average of less than one or about 0.49 riders per vehicle. This increase would not have a significant impact on transit service.

A pedestrian crosswalk analysis was conducted at the intersections of Kearny/Jackson and Kearny/Washington to determine weekday PM peak hour conditions under the existing-plus-project scenario. Under existing and existing-plus-project conditions, all study pedestrian facilities operate or would operate at LOS B or better. This is considered an acceptable service level, and no corrective measures would be required. Pedestrian access to the proposed Site A building would occur mid-block along the Kearny Street frontage and from a curb cut drop-off area. Pedestrian access to the proposed Site B building would occur mid-block along the Columbus Avenue frontage; internal access would also occur from within the parking garage.

Based on a survey of 18 parking facilities in the study area (consisting of 2,043 parking spaces), off-street parking occupancy for the entire study area is estimated to be approximately 91 percent during the weekday midday period (1:00 to 3:00 p.m.). On-street parking in the project study area is primarily available at one-hour and two-hour meters, which are typically well utilized and have a high turnover rate.

The *City Planning Code* requirement for the proposed project would be 91 parking spaces (70 for Site B and 21 for Site A). The project's weekday peak parking demand, calculated utilizing San Francisco Planning Department methodology, was estimated to be 150 parking spaces (140 for Site B and 10 for Site A). The proposed project would provide a total of 239 off-street parking spaces, of which 154 spaces would be provided at Site A and 85 would be provided at Site B. Of the 154 spaces at Site A, 147 would be publicly accessible and the remaining seven would be residential. The 85 spaces at Site B would be valet residential spaces, and no parking would be provided for proposed retail uses.

The parking demand for four spaces created by the school could be met in the 147-space publicly accessible parking provided on Site A. The parking demand for six spaces created by the elderly housing component would be met by the proposed supply of seven residential spaces. The demand for 35 parking spaces created by the proposed retail uses at Site B could be met in the 147-space parking garage provided on Site A, or in other nearby (off-site) parking facilities (the parking survey indicates that there are approximately 185 spaces available in the area during the midday peak period). Based on the currently proposed supply, there would be an unmet parking demand for 20 spaces generated by the residential component of Site B.

Site A is located within the Chinatown Residential Neighborhood Commercial District. As such, the school component at Site A is exempt from off-street parking requirements (Section 161). The proposed project would, however, be required to provide 21 parking spaces for the elderly housing component at Site A. The project would therefore provide 14 fewer parking spaces at Site A than required by the *City Planning Code*. Site B is located within the Chinatown Community Business District. As such, the retail component at Site B is exempt from off-street parking requirements (Section 161). The proposed project would, however, be required to provide 70 parking spaces for the residential component at Site B; the 85 valet spaces proposed would meet this requirement.

It is estimated that Site A would generate approximately 7.7 deliveries per day, which is equivalent to a demand for 0.35 spaces in an average hour and 0.44 spaces in the peak hour. Site B is estimated to generate approximately 4.3 daily deliveries, equivalent to 0.20 spaces/average hour and 0.25 spaces/peak hour. Delivery vehicles would consist primarily of vans and two-axle trucks. The *City Planning Code* requires one off-street loading space to be provided at the project site. The project is not proposing any spaces since van loading for Site A

would be accommodated within the Site A garage (accessible via Jackson Street) and loading for Site B could also occur within the Site B garage (accessible via Washington Street), and one loading zone would be requested for Site B either on Washington Street or Columbus Avenue. Neither garage could accommodate large trucks, such as moving vans.

Temporary construction-related transportation impacts would result from construction employees and truck movements to and from the site during demolition of the Colombo Building (Site B), excavation of new garages and foundations, and building activity. Project construction would require approximately 22 to 24 months. While most construction staging would occur on-site, it is anticipated that sidewalk closures would be required around the site (Kearny Street, Jackson Street, Washington Street and Columbus Avenue), and that adjacent curb lanes would be occupied to provide pedestrian detours or that pedestrians would be routed to sidewalks across the street. Temporary relocation of bus stops adjacent to the site may also be required, subject to MUNI review and approval. Double parking of trucks along Kearny Street may also be required for trucks unloading materials to Site A and along Columbus Avenue for Site B. Lane and sidewalk closures are subject to review and approval by the Department of Public Works (DPW). A revocable encroachment permit from DPW would be required if materials storage and/or project staging occurred within IIs Lane, one of two stub streets located within the project block.

Any truck traffic occurring during the hours of 7:00 to 9:00 a.m. and 3:30 to 6:00 p.m. would coincide with peak-hour traffic and could temporarily impede traffic flow. The impact of lane closures and construction truck traffic would be a lessening of the capacities of streets, slowing movement of traffic (including MUNI buses). Lane blockage on Kearny Street by queued trucks, if it were to occur, would reduce the capacity of this street and interfere with the operation of transit vehicles. Limiting truck movements to the hours between 9:00 a.m. and 3:30 p.m. (except for special circumstances, such as specific construction activities that cannot be accommodated during a 6.5-hour time frame) would minimize disruption of the general flow of traffic on adjacent streets during AM and PM peak periods.

AIR QUALITY (Pages 99 to 102)

Project-related vehicular traffic would not have a significant effect on air quality. The project would contribute less than one percent to the transportation-related emissions inventory for San Francisco, which is below the one-percent threshold of potential significance. However,

emissions of particulates generated by the project together with cumulative development , would increase particulate concentrations, which would increase the frequency of fine particulate matter standard violations in San Francisco, with proportionally increased health effects and reduced visibility.

EMPLOYMENT AND HOUSING (Pages 102 and 103)

At full operation, the project would accommodate approximately 50 permanent full-time jobs for retail, school, Catholic community and social center, and janitorial/service functions. The approximately 40 employees currently on Site B would be displaced. The project would provide 104 low-income senior citizen housing units and 70 market-rate housing units.

HAZARDS (Pages 103 and 104)

Past land uses and placement of fill material on the sites following the 1906 earthquake and fire have resulted in some subsurface contamination. Preliminary sampling and analysis of soils on the sites have indicated that lead is present at levels that may be considered hazardous. During construction activities, there is the potential to expose workers and the public to contaminated soils, particularly through release of contaminated dusts or vapors. Also, during site excavation, underground tanks may be encountered that would require removal pursuant to the City's tank removal ordinance. The presence of lead will necessitate the implementation of health and safety measures, dust control procedures, and proper disposal of the excavated material. These measures would be described in a Site Mitigation Plan (SMP). Project implementation would reduce hazards by treatment and/or removal and disposal of hazardous wastes presently on the site.

GROWTH-INDUCING IMPACTS (Pages 104 and 105)

The project would not be expected to generate growth-inducing effects. Because the project would be built in a developed urban area, no expansion of the municipal infrastructure not already under consideration would be required to accommodate new development and increased employment due to, or induced by, the project.

C. MITIGATION MEASURES

Primary measures that would mitigate potentially significant environmental effects are presented below. A full recitation of mitigation measures proposed as part of the project or under consideration by the project sponsor, and those under the jurisdiction of other agencies is presented on pages 106 through 113. Mitigation measures marked by an asterisk (*) are from the FEIR.

MEASURES PROPOSED AS PART OF THE PROJECT

Cultural Resources

- The project sponsors would retain the services of an archaeologist.

Site A: Because planned construction would entail excavation and topographic modification to depths that would exceed the level of previous subsurface archaeological investigations, the project sponsors have agreed to retain the services of an archaeologist who would conduct a focused program of systematic on-site monitoring and data recovery procedures during excavation of Site A. During the monitoring program, the project sponsors would designate one individual on-site as its/their representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources, should they be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist would document, preserve, and recover the cultural material. The archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration, and/or recovery program was conducted.

- * **Site B:** Given the location and depth of the excavation proposed, and the likelihood that archaeological resources would be encountered on the project site, the project sponsors have agreed to retain the services of an archaeologist. Following demolition of the Colombo Building, but during removal of foundation materials if determined necessary by the archaeologist, as well as during excavation, the archaeologist would carry out a pre-excavation testing program to better determine the probability of finding cultural and historical remains. The testing program would use a series of mechanical, exploratory borings, or trenches, and/or other testing methods determined by the archaeologist to be appropriate.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist would submit a written report to the Environmental Review Officer (ERO), with a copy to the project sponsors. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional mitigation measures would be implemented by the project sponsors and might include a program of on-site monitoring of all site excavation, during which the archaeologist would record observations in a permanent log. The monitoring program, whether or not there are finds of significance, would result in a written report to be submitted first and directly to the ERO, with a copy to the project sponsors. During the monitoring program, the project sponsors would designate one individual on-site as its/their representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist would immediately notify the ERO, and the project sponsors would halt any activities that the archaeologist and the ERO jointly determine could damage such cultural resources. Ground disturbing activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the archaeologist would prepare a written report to be submitted first and directly to the ERO, with a copy to the project sponsors, which would contain an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific mitigation measures to be implemented by the project sponsors. These additional mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of the cultural material.

Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration, and/or recovery program was conducted.

Should human remains of Native American origin be encountered during excavation or construction activities and to assure preservation and protection of remains in a respectful manner, the project sponsors would contact the County Coroner's office and the Native American Heritage Commission, pursuant to the procedures set forth in Section 7050.5 of the *Health and Safety Code* and Sections 5097.9 to 5097.99 and 509.991 of the *Public Resources Code*.

- Prior to the demolition of the Colombo Building, the building could be documented for the Historic American Buildings Survey (HABS). HABS documentation would be planned in advance in a conference between the preparer and officials of the National Park Service in order to match the level of documentation to the specific building. For the building, a full set of drawings, large format archival photography, and a written history would be appropriate.

Transportation

- * ● Generally during the construction period, construction truck movement would be permitted only between 9:00 a.m. and 3:30 p.m. to minimize peak-hour traffic (including transit) conflicts except for specified special construction activities that cannot be carried out in a 6.5-hour time frame. The project sponsors and construction contractor(s) would

meet with the various City agencies to determine feasible traffic mitigation measures to reduce traffic congestion, including transit disruption (for example, potential relocation of bus stops), and pedestrian circulation impacts during construction of this project and other nearby projects that are planned for construction or which later become known. An exception would be made during underpinning, shoring and excavation to permit construction truck movements between 7:00 a.m. and 3:30 p.m. and during the approximately 20 hours for continuous pour of the mat foundation. Prior to issuance of foundation permits, project sponsors would consult with the Department of Parking and Traffic to establish a route for truck traffic that would cause the least interference with morning commute traffic on City streets.

Hazards

- The project sponsors have agreed to prepare a soils investigation report for the project site by a qualified consulting firm (with California-licensed Geotechnical Engineers). As part of the study, the soils would be tested for the presence of any hazardous contamination that might be found at the project site, including PCB-containing materials. In the event that any hazardous wastes are identified which exceed the State and Federal standards (including acceptable levels of petroleum hydrocarbons at Class II or III landfills), the project sponsors would agree to implement a Site Mitigation Plan (SMP) prepared by the consultant. The SMP would detail the specific treatment of wastes, including sampling, monitoring and other soil handling procedures to be performed by a licensed contractor in accordance with the State and Federal regulations and the site-specific health and safety requirements. Remediation of any hazardous contamination that might be found at this property could be under the supervision of the San Francisco Department of Public Health, if accepted by that Department, as delegated by the California EPA Department of Toxic Substances Control (DTSC) pursuant to SB 1248; if the City Health Department did not choose to accept supervision, then the activity would be supervised by the DTSC. The SMP would also include implementation of a health and safety plan for workers on the site and a notification on the site for construction workers regarding location and type of contamination present. After the project site has been remediated, the consultant that prepared the SMP would certify that the site is clean and useable for the proposed project.

Construction Air Quality

- * ● The project sponsors would require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that nonpotable water be used for dust-control activities. Therefore, the project sponsors would require that the contractor(s) obtain reclaimed water from the City Clean Water Program for this purpose.

Geology

- One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsors and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project.

MEASURES THAT COULD BE IMPLEMENTED BY OTHER AGENCIES

- * ● Work schedules of Pacific Gas and Electric Company and other utilities requiring trenching could be coordinated, so that street disruption would take place during weekends and off-peak hours. This should be done through the San Francisco Committee for Utility Liaison on Construction and Other Projects (CULCOP). In-street utilities should be installed at the same time as the street is opened for construction of the project to minimize street disruption.

D. ALTERNATIVES TO THE PROPOSED PROJECT (Pages 115 to 127)

The Alternatives to the Proposed Project section of this EIR describes alternatives contained in the 1987 Final EIR and their current relevance, identifies alternatives to the currently proposed project, discusses environmental impacts associated with these alternatives, and gives reasons the alternatives were rejected in favor of the proposed project. Regardless of the sponsors' reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site.

The 1987 Final EIR contained seven project alternatives, including:

- A: No Project Alternative
- B: Code Conforming (with Conditional Use) Alternative
- C: Preservation Alternative
- D: Code Conforming 40 Ft. (No Conditional Use) Alternative
- E: Increased Housing Alternative
- F: Chinatown Resource Center and Asian Neighborhood Design Alternative
- G: Reduced Office Space Alternative

Alternatives B, D, E, and F are no longer considered relevant in the context of this Supplemental EIR, either because they responded to *City Planning Code* provisions no longer in effect or because the current preferred project carries out much of the intent of the former alternatives.

Alternatives A, C, and G are considered relevant to the current project, and in addition, two new alternatives — a smaller building on Site A and reduced housing on Site B — have been added and are described below in the context of the current project alternatives.

CURRENT ALTERNATIVES

Alternative A: No Project

This alternative would entail no physical change to the site as it now exists. Site A would remain an excavated, vacant parcel. On Site B, the Colombo Building would be retained, and the adjacent excavated parcel would remain vacant. Alternative A in the FEIR was also a No Project Alternative, which would have retained the site as it existed in 1987. This alternative would not preclude redevelopment of all or part of the project site in the future, with larger or smaller development than the project as proposed.

If this alternative were implemented, none of the impacts associated with the proposed project would occur. In general, the environmental characteristics of the current No Project Alternative would remain as described in the Environmental Setting of this report. There would be no effects on architectural resources, as the Colombo Building would not be demolished.

Alternative B: Preservation

Alternative B for this SEIR would be similar to Alternative C for Site B in the 1987 FEIR: the Colombo Building would be retained, an additional floor would be added to the Colombo Building covering 75 percent of the building footprint, and a new seven-story office building would be constructed on the vacant portion of Site B. (The FEIR alternative was for an eight-story building, which would have cast shadows on Portsmouth Square, representing a violation of the Shadow Ban Ordinance.) The proposed project for Site A would remain in this alternative. This alternative would include a total of approximately 41,000 sq. ft. of office space, 80,000 sq. ft. of residential space (105 units as for the proposed project), 9,500 sq.ft. of retail space, and 154 parking spaces on Site A and 31 spaces on Site B).

The primary objective of Alternative B is preservation of the Colombo Building, which may be potentially eligible for listing in the National Register. In order to develop the site and preserve the Colombo Building, the western portion of Site B would include a new building. The office

space in this alternative would generate a higher daily on-site population, a higher level of pedestrian activity, and a greater secondary effect in terms of potential growth inducement and employment than the proposed project.

Office space would generate a lower level of peak hour trip generation, parking demand and transit ridership than the proposed project. Consequently, traffic and air quality effects on local intersections would be about the same or lower under this alternative than the proposed project. There would be a housing demand of about 14 units generated by office workers. The seven-story structure on Site B would not cast new shadow on Portsmouth Square.

Effects related to geology and hydrology would be less than those of the proposed project because the excavation on Site B would be less than the proposed project. The impact on prehistoric cultural resources could still occur on portion of Site B for the new structure; however, the historic architectural resources of the Colombo Building would be preserved and enhanced as the project would restore the architectural integrity of the structure.

Alternative C: Reduced Housing on Site B

Under Alternative C, Site A would be developed with the same uses as the currently proposed project, and Site B would be developed with less housing than currently proposed. On Site B, this alternative would include 46 market-rate housing units, compared to 70 under the proposed project, and 50 parking spaces, compared to 65 under the proposed project. The new building at Site B would be seven stories and 74 ft. in height, compared to 10 stories and 94 ft. in height under the proposed project.

Loss of the Colombo Building would remain a significant impact under this alternative. Other impacts of this alternative would be slightly less than the proposed project as there would be 24 fewer residential units. The urban design, visual quality and shadow impacts under this alternative would be slightly reduced as the building would be 20 ft. lower. This alternative would generate fewer overall trips than the proposed project and there would be lower traffic-related air quality impacts. This alternative would have fewer residents. The effects related to geology and hydrology and potential subsurface cultural resources would be less than those of the proposed project because excavation would be limited to the existing level below grade. There would also be a corresponding reduction in demand for public services and energy.

As the proposed project would not cause any significant environmental impacts, this alternative would not reduce any significant effects.

Alternative D: Office Uses on Site B

Under this alternative, Site A would be developed with the same uses as the proposed project, and Site B would be developed with office and retail rather than housing uses. On Site B, this alternative would include 81,300 sq. ft. of office space, 9,900 sq. ft. of retail space, and 31 parking spaces. This alternative is similar to Alternative G for Site B in the FEIR, which was the approved project following certification of the Final EIR.

From a land use perspective, Alternative D would be a more intense development than the currently proposed project. It would generate a higher level of pedestrian and vehicular activity, have a larger daytime population, and generate a greater secondary effect in terms of growth inducement and employment.

Alternative D would cause the same historic architectural impacts as the proposed project because the Colombo Building would not be retained and restored. The same archaeological impacts would occur and mitigation measures would be necessary.

All study intersections would continue to operate at LOS B or better under this alternative, as they would with the proposed project. Under Year 2010 cumulative traffic conditions (including this alternative), LOS B would be maintained at all study intersections except Jackson/Columbus, where traffic flow would degrade to LOS C. This level of service, however, is still considered acceptable. The alternative proposes 31 valet parking spaces, leaving an unmet demand for 107 parking spaces, which could be accommodated by public parking proposed at Site A, or by other public parking lots in the study area. However, if parking is unavailable, some vehicle trips could shift to transit trips, thus affecting the already overcrowded transit lines.

Air quality, energy and noise effects associated with on-site uses under this alternative would be slightly higher than the proposed project due to the increase in peak hour vehicle traffic, but would not be substantial enough to cause new significant effects.

Alternative E: Smaller Building on Site A

Under this alternative, Site A would contain 58 residential units, a parking garage with 154 spaces, the same number as the proposed project, and smaller Catholic Center and School than the proposed project in a six-story building covering the entire site. Site B would be developed with the same uses as the currently proposed project.

For Site A, this alternative would be less noticeable than the proposed 15-story tower and would create less of an effect on the scale and urban texture of the project vicinity.

The less intense uses on Site A and the residential uses on Site B would generate fewer vehicle trips than the proposed project and less air pollutant emissions and traffic noise associated with on-site uses. The same historic architectural impacts on Site B would occur with this alternative, and the loss of the Colombo Building would remain a significant impact. The wind and shadow effects on Site A would be substantially reduced with the smaller building. The effects related to geology and hydrology and potential subsurface cultural resources would be the same as those of the proposed project.

E. ISSUES TO BE RESOLVED

The project site has been controversial since the tenants were evicted in 1977 at the International Hotel (a low-cost, long-term residential hotel occupying the northern lot on the project's Site A), and the hotel was demolished in 1979. The 104 affordable units on Site A are designed to meet the need for low-income senior housing.

Issues to be resolved include the demolition of the Colombo Building on Site B and the relationship of the project to Chinatown and the Jackson Square Historic District. The City Planning Commission (or the Board of Supervisors upon any appeal of Conditional Use authorization) will decide whether to approve or disapprove the proposed project after review and certification of the EIR. In selecting or rejecting project alternatives, decision makers may also make use of other information in the public record.

II. PROJECT DESCRIPTION

A. PROJECT SPONSORS' OBJECTIVES

The proposed project would create a mixed use development containing affordable senior housing, an elementary school, a Chinese language and cultural school, a religious pastoral and social center, and a parking garage at the intersection of Kearny and Jackson Streets (Site "A"); and market-rate housing, ground floor retail and parking at the intersection of Washington Street, Columbus Avenue and Montgomery Street (Site "B"). The project sponsors for the various components are: Elderly Housing, The Kearny Street Housing Corporation and the Chinese Community Housing Corporation (Site A); Schools and Garage, The Archdiocese of San Francisco and St. Mary's Chinese Catholic Center and Schools (Site A); and Market Rate Housing, the Pan Magna Group (Site B). The project sponsors have the following objectives:

- Provide 104 affordable housing to very low-income elderly City residents on Site A consistent with the Housing and Urban Development financing commitment
- Provide community space for the Chinese and Philippine citizenry
- Provide a Catholic Center within Chinatown that would contain St. Mary's Chinese School (replacing the school facilities formerly located in Chinatown at Stockton and Clay Streets and temporarily located at Guadalupe Church on Broadway and Mason Street), with gymnasium and outdoor space on-site, and a religious pastoral and social center on Site A
- Provide a parking garage on Site A that would meet the parking demand for the Catholic Center, St. Mary's School, and housing; generate revenue to pay for the construction and maintenance of the garage; and help support operations for the Catholic Center
- Provide market rate housing with available parking on Site B and realize reasonable land value of the property
- Complete the project on schedule and within budget
- Provide a complementary mix of market-rate and affordable housing and community facilities at a single location

Gordon H Chong + Associates of San Francisco is the lead project architect for Site A, assisted by Herman Stoller Coliver Architects, Tai Associates/Architects and Greg Rojas Architects; James Titus is the architect for Site B.

B. PROJECT LOCATION

The proposed project would be located on Lots 4, 5, 11 and 13 of Assessor's Block 195 adjacent to City's financial district and Chinatown (Figure 1, page 23). Lots 11 and 13, located at the southeastern corner of the intersection of Kearny and Jackson Streets, constitute Site A; Lots 4 and 5, situated at the northwestern corner of the intersection of Columbus Avenue and Washington and Montgomery Streets, comprise Site B. The two sites are connected by IIs Lane.

Site A: The 18,920-sq.ft. site is currently vacant. The International Hotel (I-Hotel), which previously occupied Lot 13 of the site, and the smaller Victory Hotel, formerly on Lot 11, were demolished in 1979.

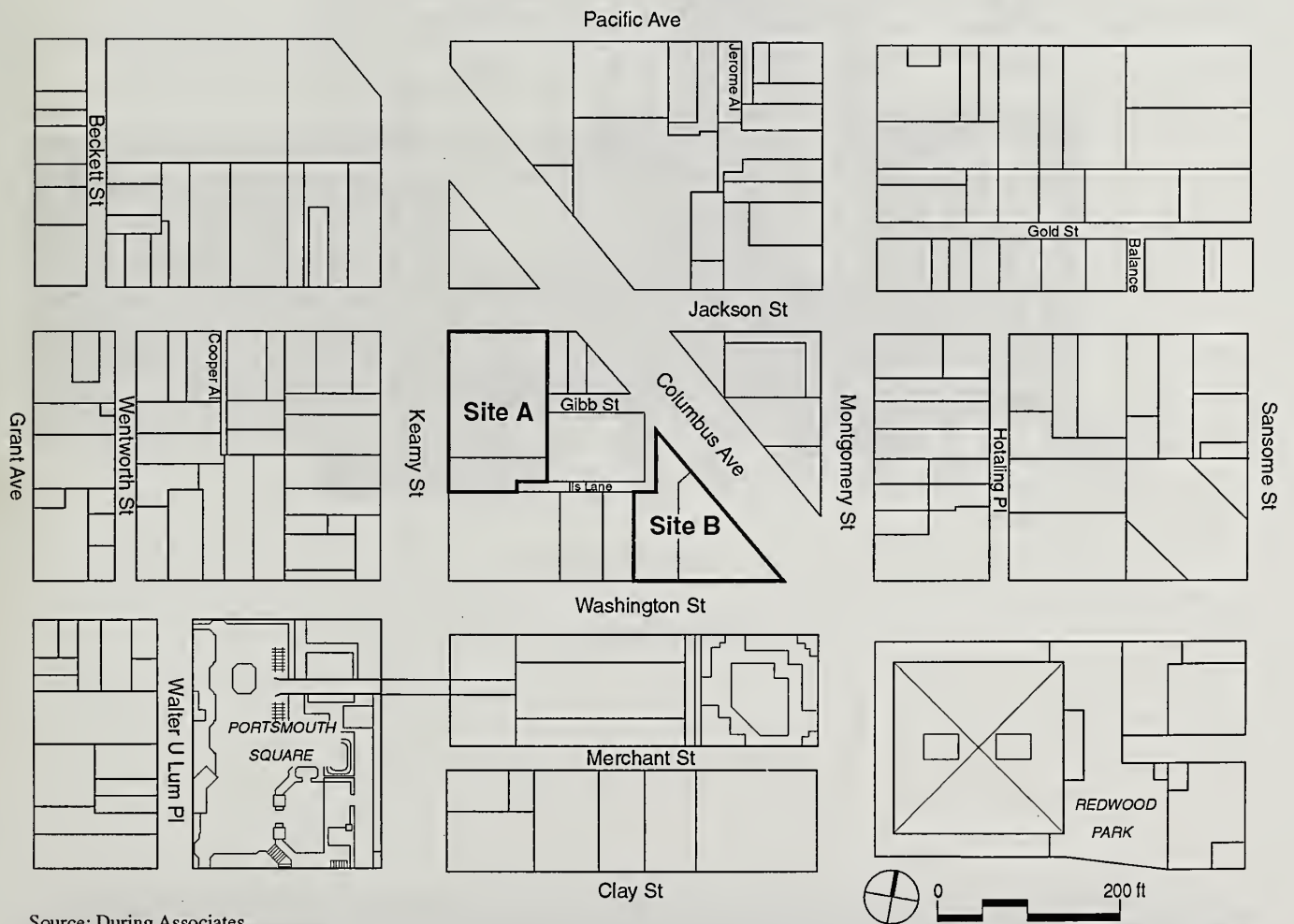
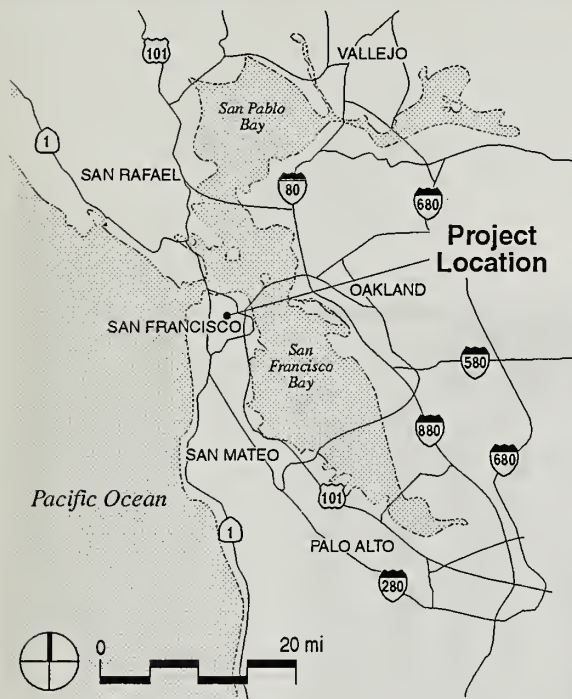
Site B: The approximately 14,060-sq.ft. site currently contains a vacant lot (formerly the site of the 70-room Bell Hotel which was demolished in 1979) and the two-story, 11,600-sq.ft. Colombo Building, with ground-floor retail uses and second-floor office uses.

C. PROJECT CHARACTERISTICS

Site A: The Archdiocese of San Francisco with St. Mary's Chinese School, the Chinese Community Housing Corporation (administering a HUD Section 202 grant and funding from the Mayor's Office of Housing) and the Kearny Street Housing Corporation, plan to construct a mixed use development with the following components (Figures 2 to 8, pages 24 to 30, include representative architectural elevations and floor plans):

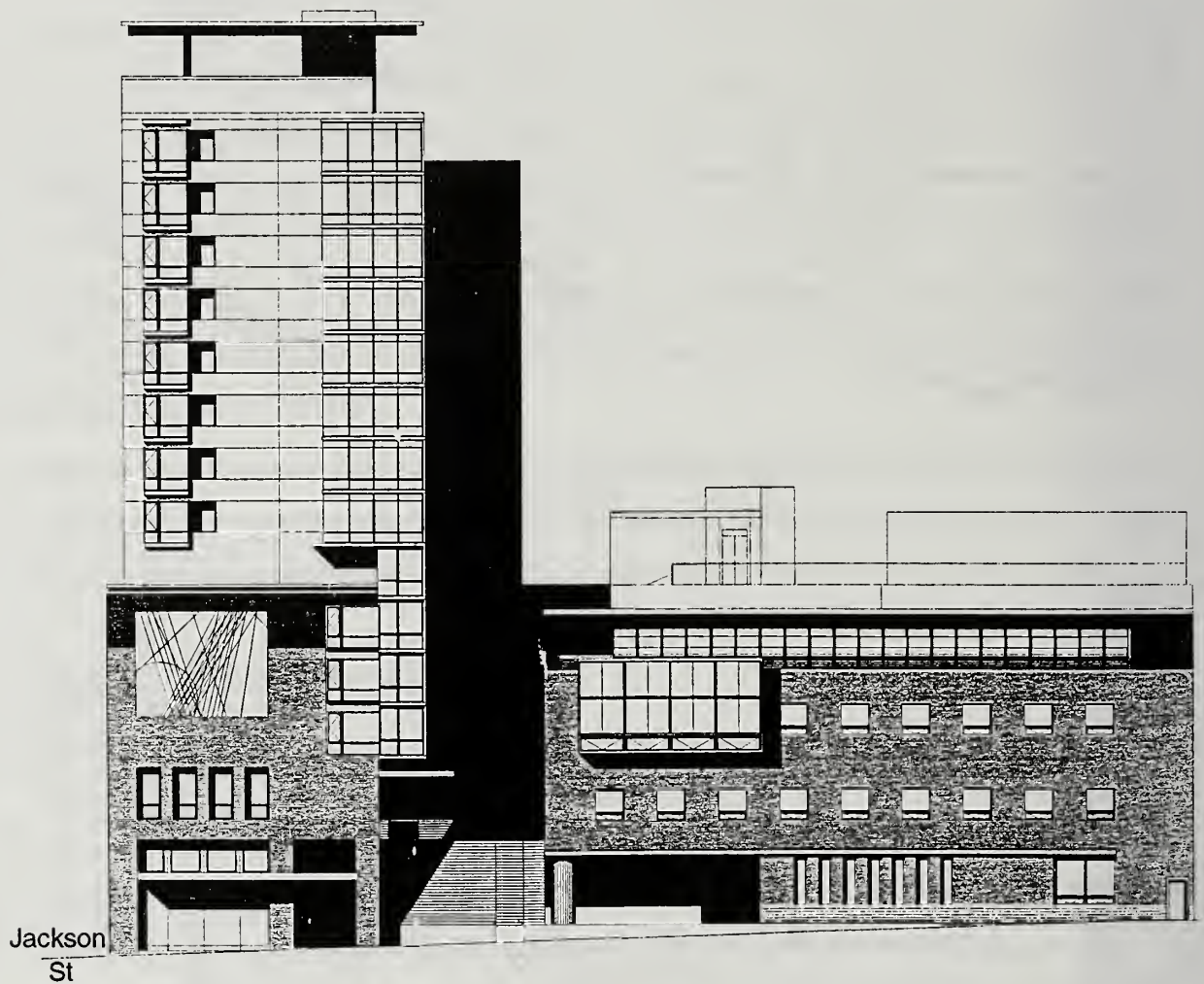
Parking Garage: The parking garage would be three-and-one-half levels below grade for the entire site and would contain 154 self-park spaces (147 commercial and seven residential). Access would be via a driveway located on Jackson Street. Van and pick-up truck deliveries for the housing, Catholic Center and schools would be made in the garage on the first level below grade near the elevators (there would not be a dedicated loading dock).

Housing: 104 units of affordable senior housing and one manager's unit would be located in a 15-story tower on the northern portion of the site. There would be



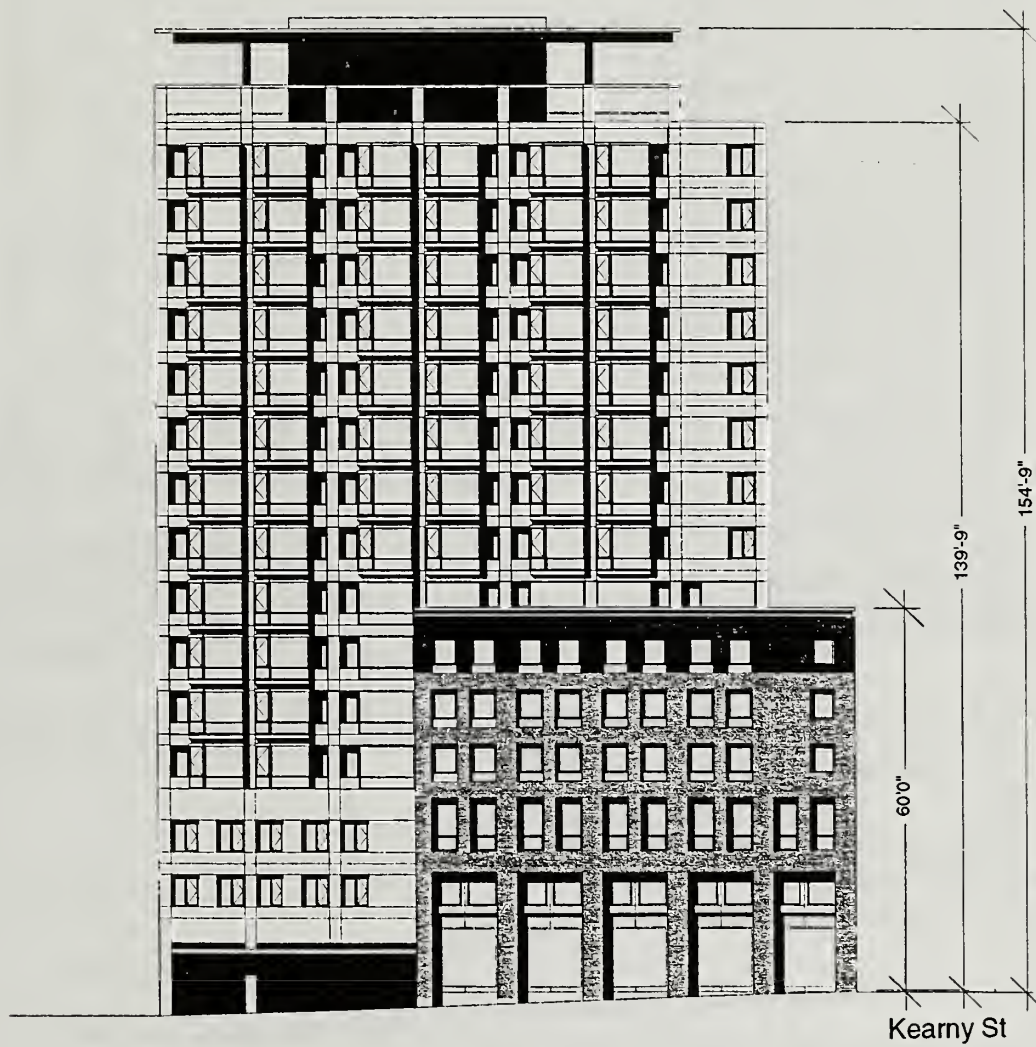
Source: During Associates

PROJECT LOCATION FIGURE 1



Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

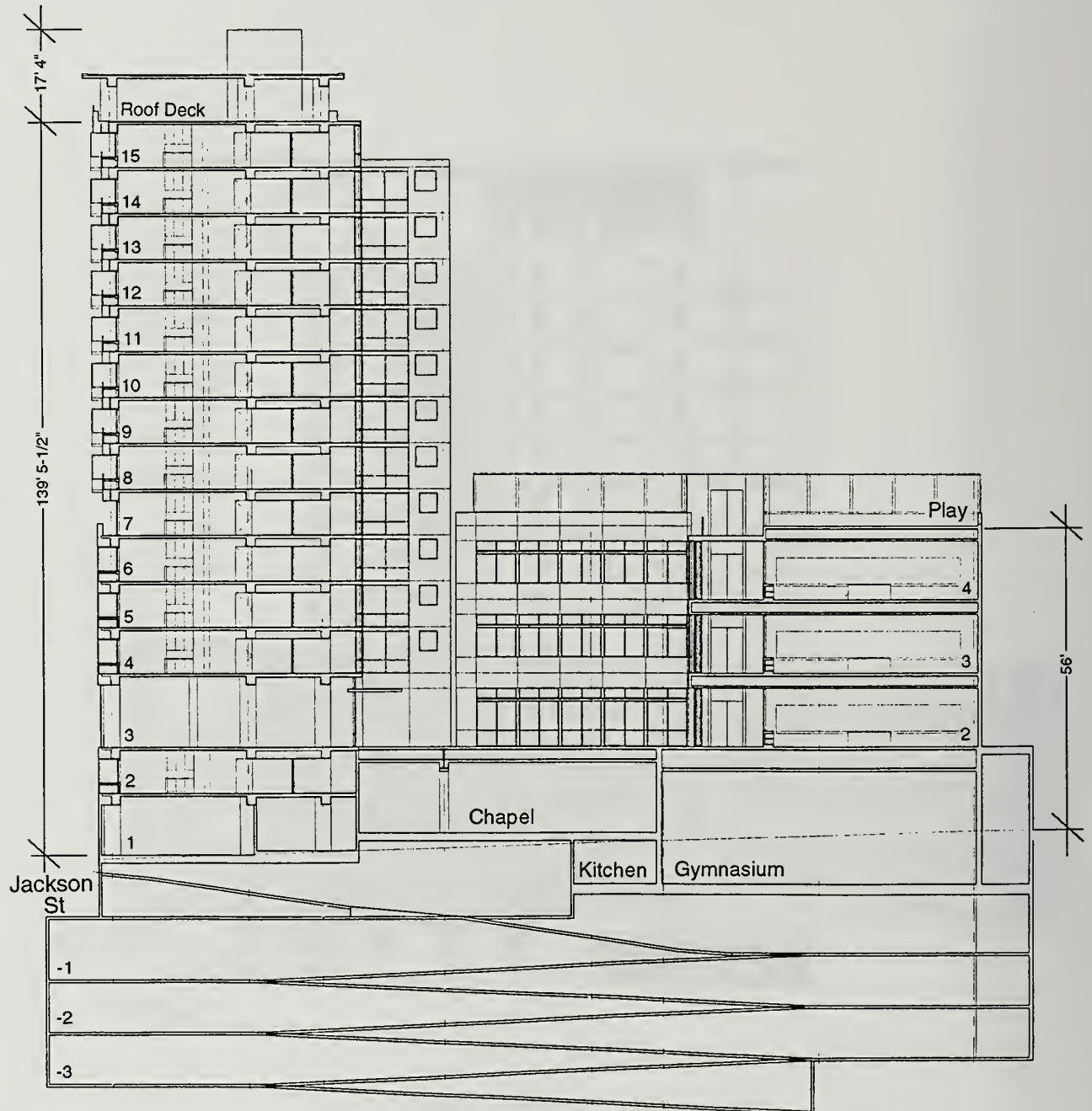
SITE A, KEARNY STREET ELEVATION FIGURE 2



Jackson Street

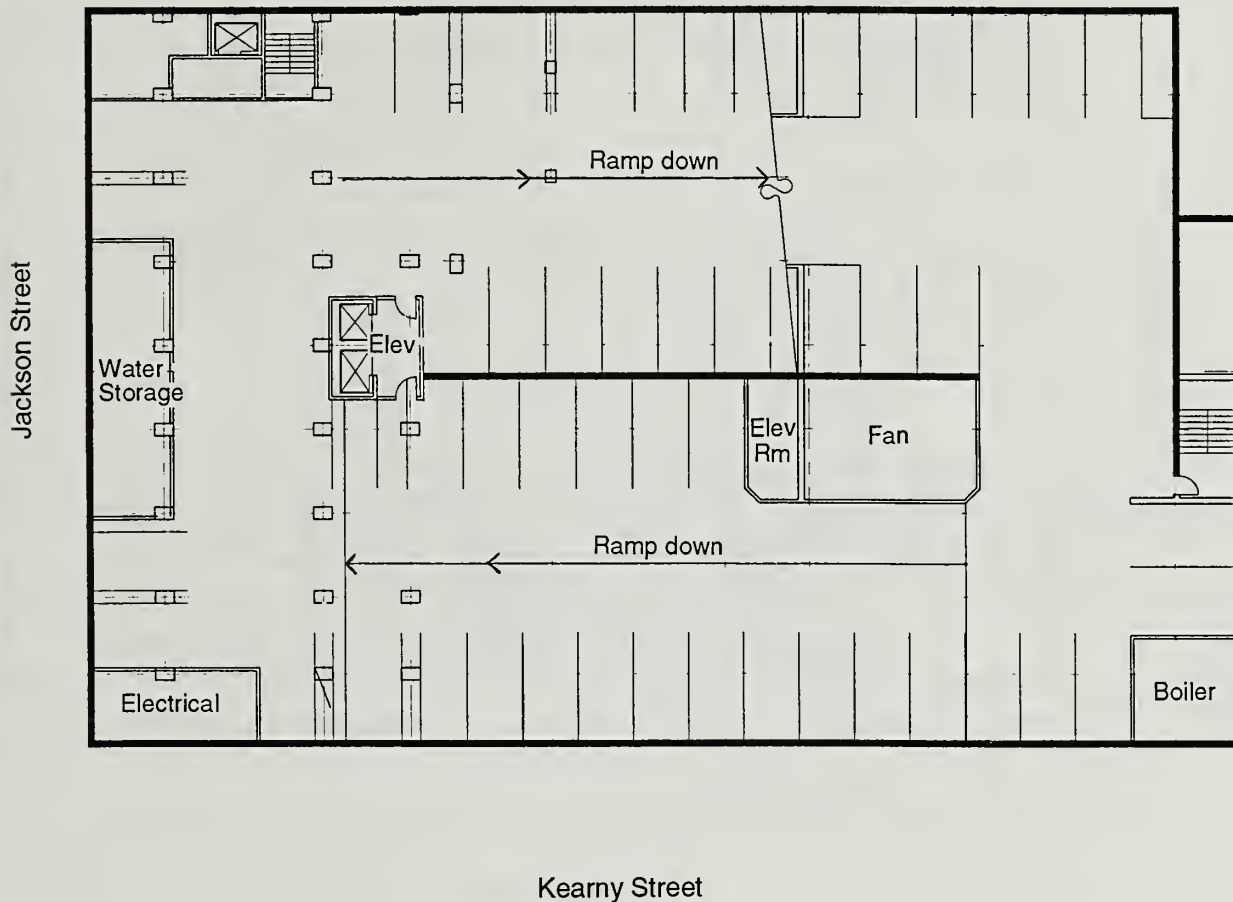
Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

SITE A, JACKSON STREET ELEVATION FIGURE 3



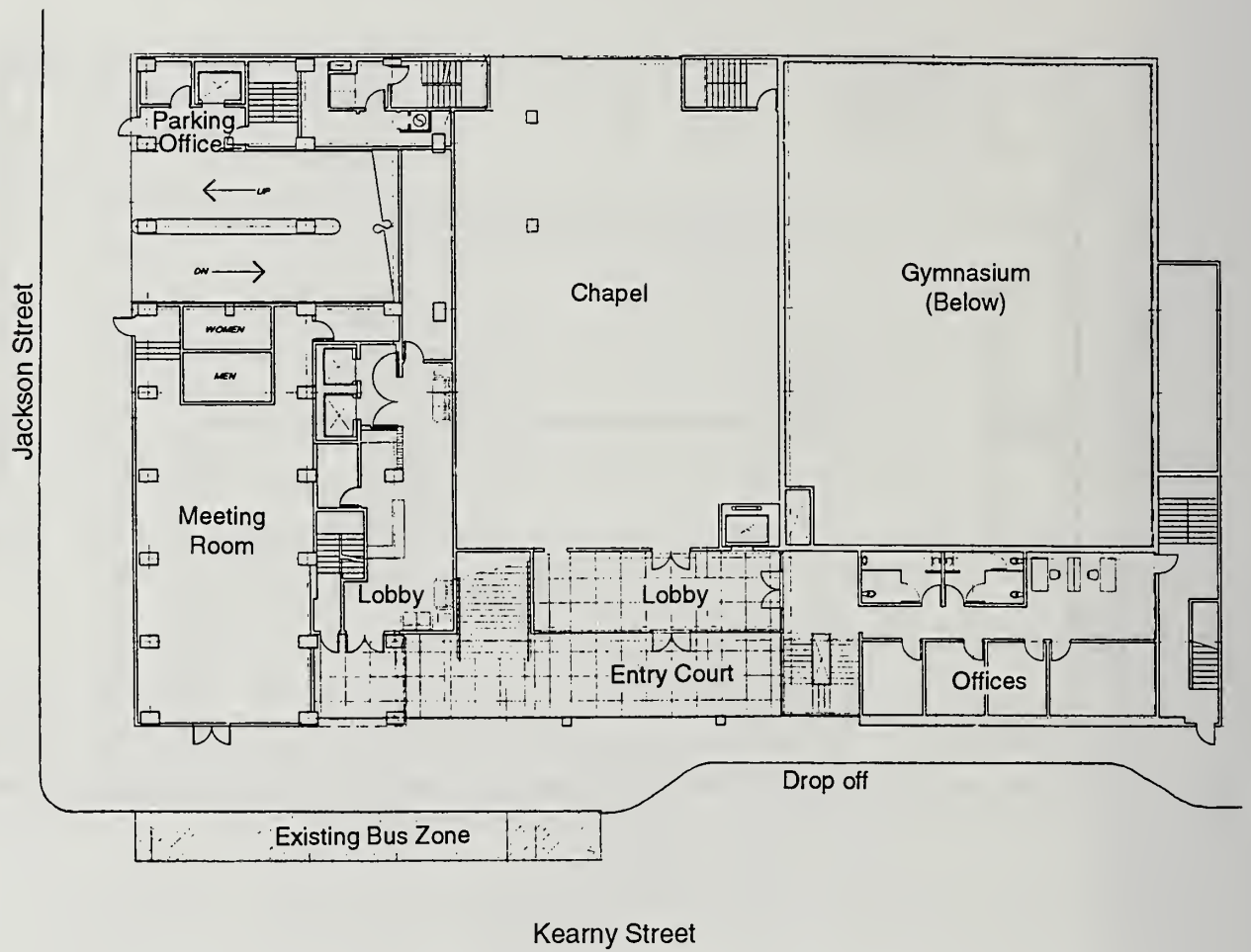
Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

SITE A, BUILDING SECTION FIGURE 4



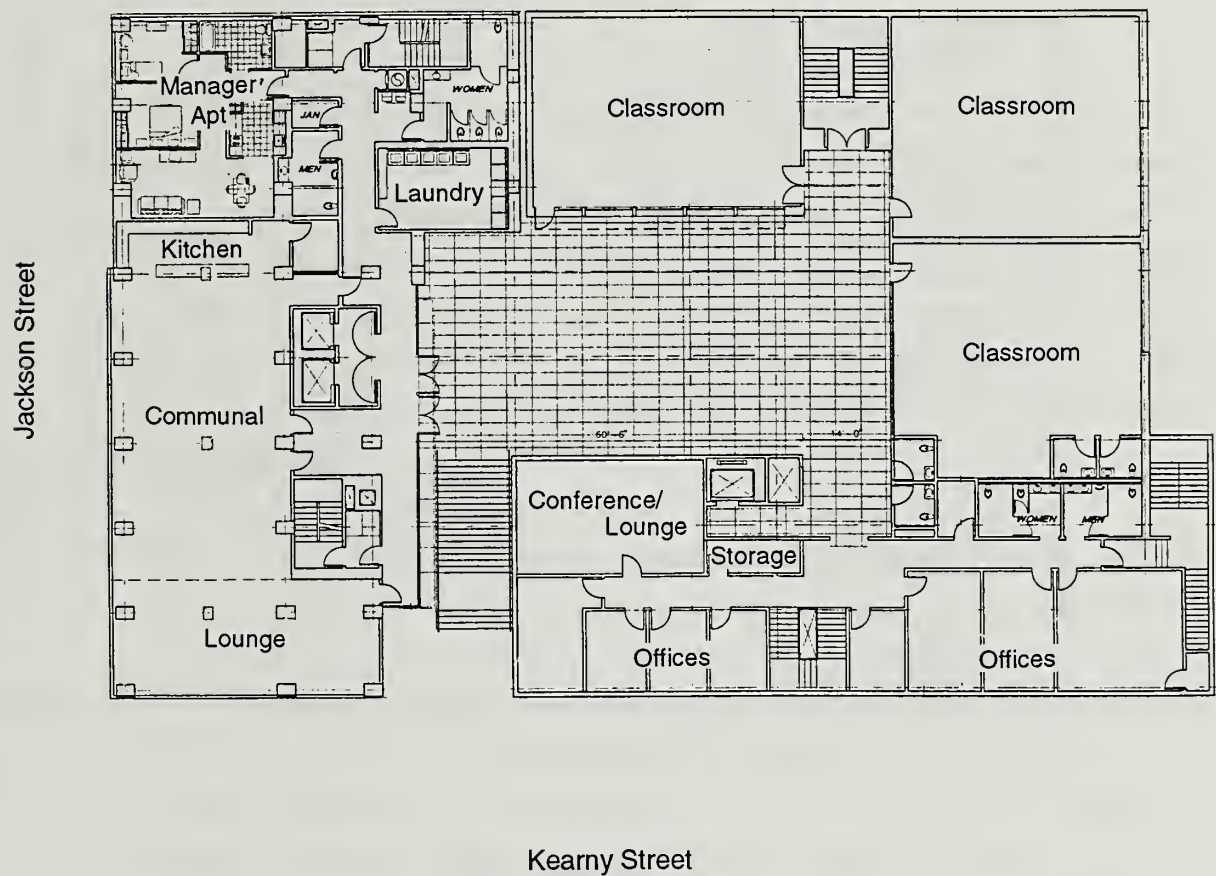
Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

SITE A, BASEMENT LEVEL PARKING PLAN FIGURE 5



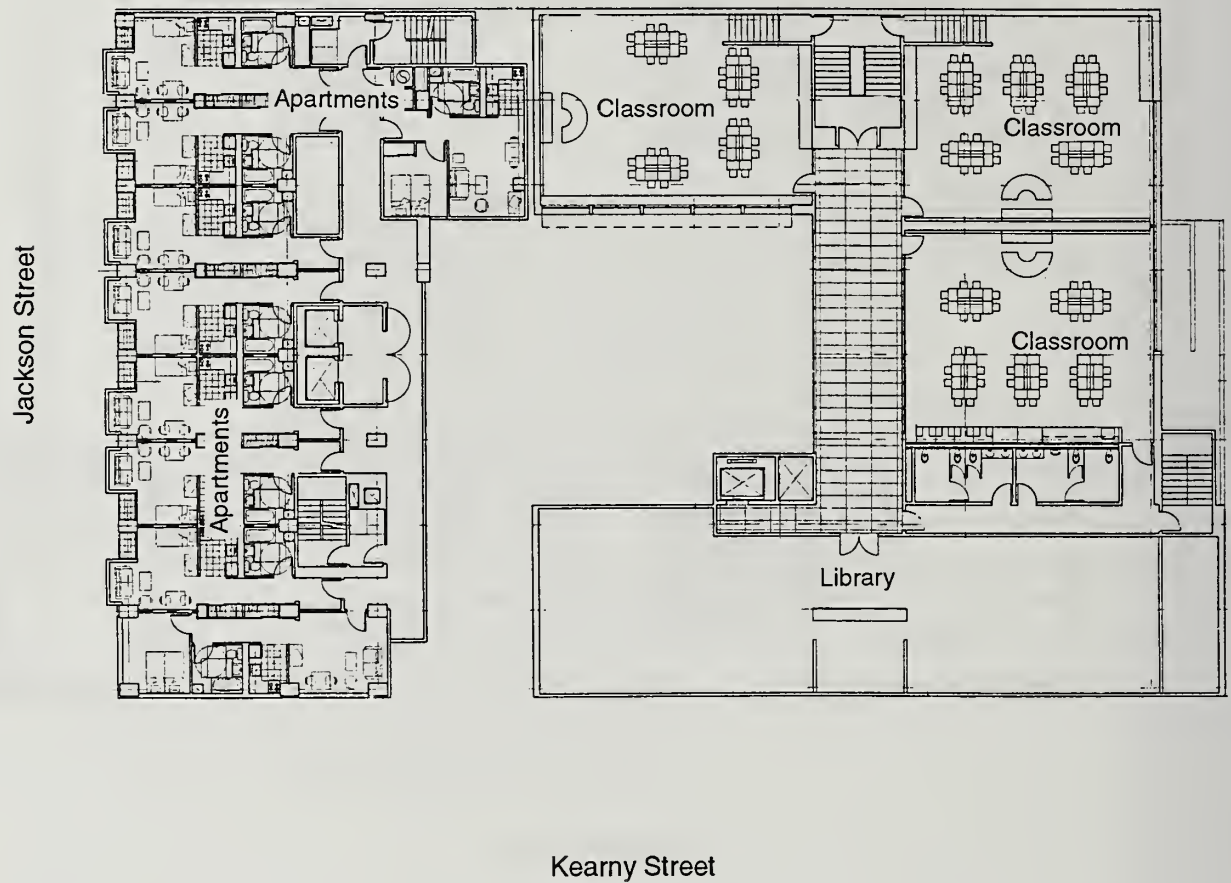
Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

SITE A, GROUND FLOOR PLAN **FIGURE 6**



Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

SITE A, SECOND FLOOR PLAN FIGURE 7



Source: Gordon H Chong + Associates, Herman Stoller Coliver Architects, TAI Associates Architects, Greg Roja and Associates Architects

SITE A, THIRD FLOOR PLAN FIGURE 8

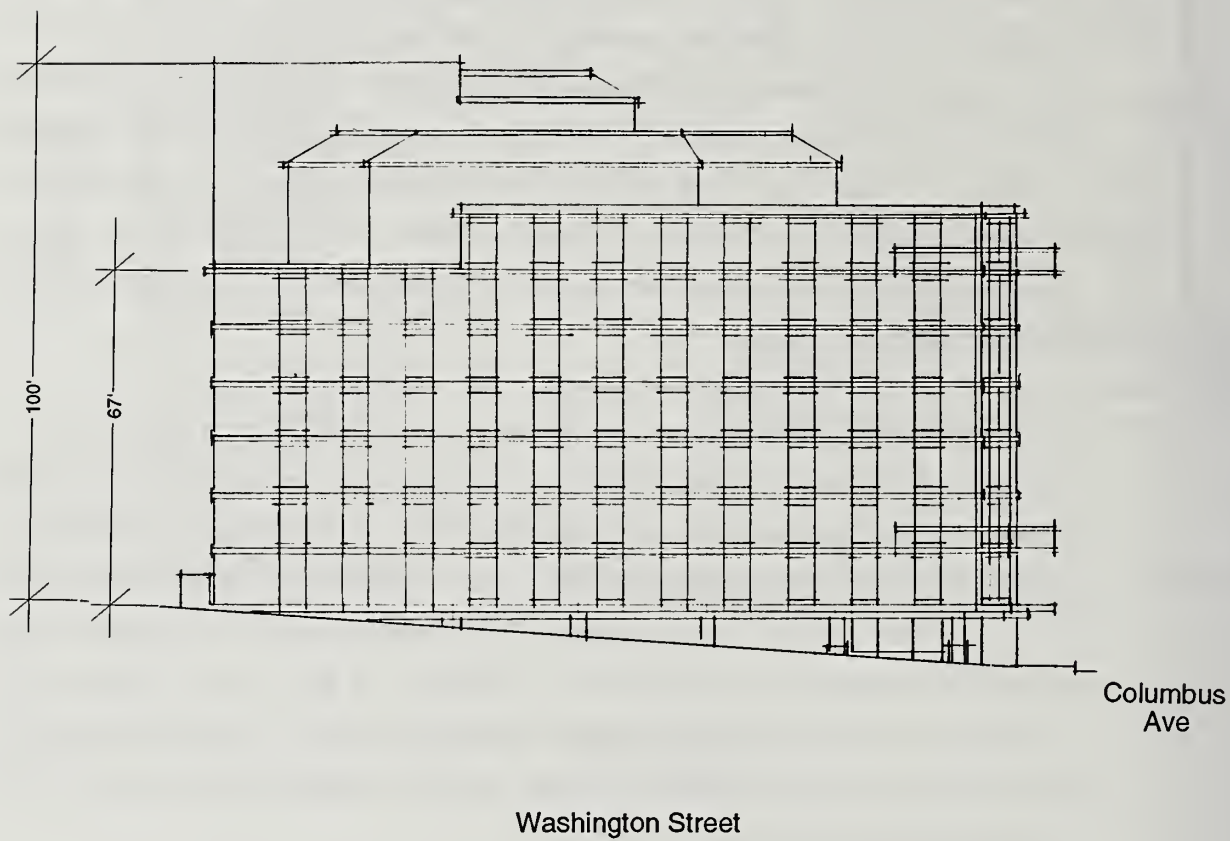
16 one-bedroom units, 88 studios and one two-bedroom unit (for the manager). The approximately 80,000 sq.ft. building would also contain several common rooms (one 2,000-sq.ft. community room on the first floor, about 4,000 sq.ft. of common use on the second floor) and three outdoor terraces on different levels in the upper portions of the building.

St. Mary's Catholic Center: The approximately 50,000 sq.ft. center would be on the southern portion of the site and would contain a gym, stage, chapel and multi-use area; school classrooms, library, kitchen, lockers and other school-related spaces; administration spaces for the schools and the chapel; and a pastoral residence. There would also be open space in two separate play areas and a courtyard. A drop-off area on Kearny Street in front the Center would accommodate about four vehicles. Materials loading for Site A would be from the parking garage.

The school would offer classes from kindergarten to the eighth grade during the day (from 8:00 a.m. to about 3:30 p.m.) to approximately 350 to 400 students, Chinese Language and Cultural studies in the afternoon (from approximately 3:00 p.m. to 5:45 p.m. to about 200 students and on Saturday mornings from 9:00 a.m. to 12:00 p.m. to approximately 350 students, and adult English and Mandarin classes in the evening (from 7:00 p.m. to 9:00 p.m.) to about 150 students, and school athletic and parent-teacher activities. There would also be school and religious weekend activities, including Sunday services (from 9:00 a.m. to 12:30 p.m.) for about 300 people.

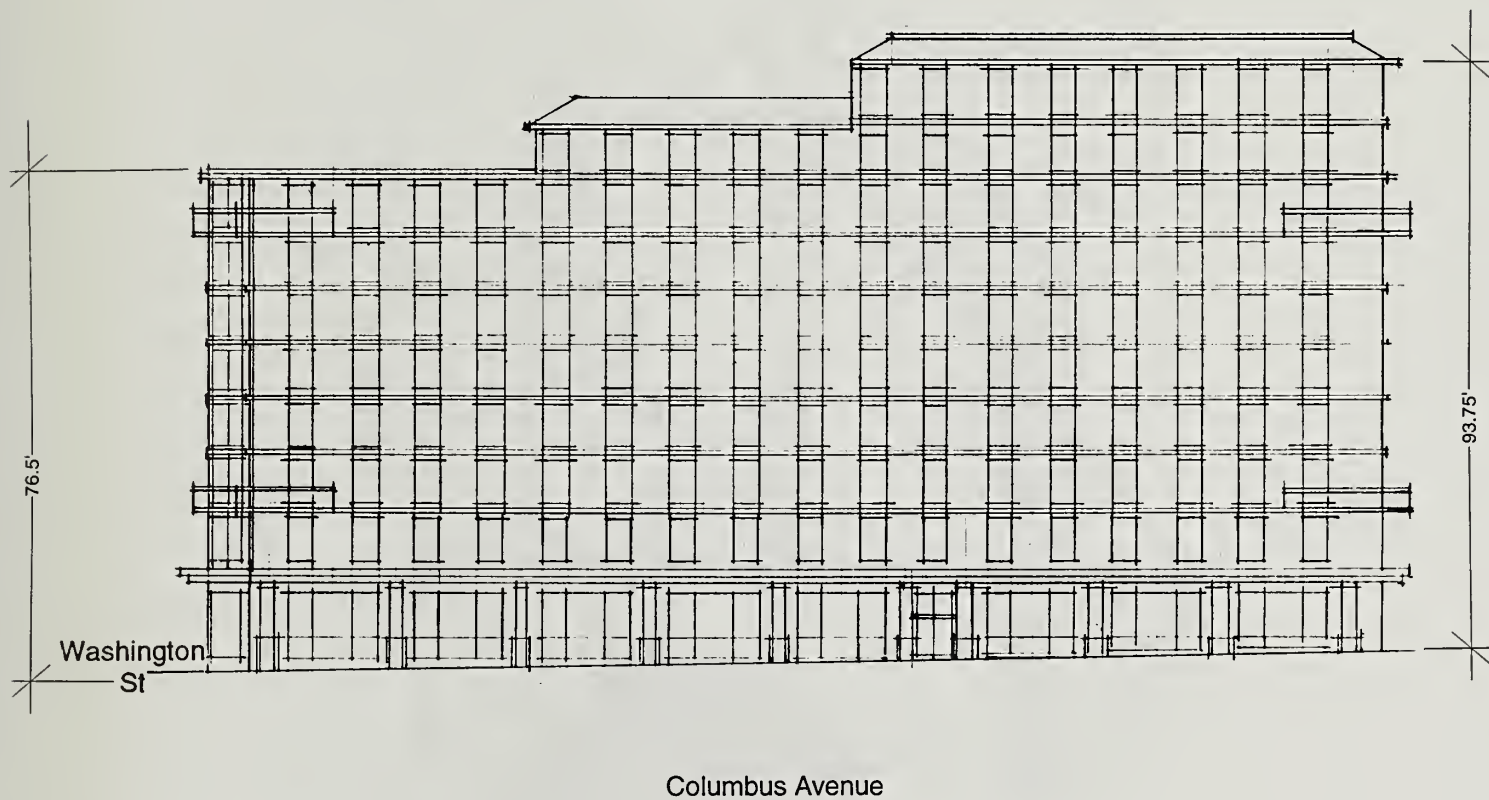
Site B: The proposed project would consist of a 94-foot-high, ten-story residential building with up to 70 two-bedroom market-rate units (Figures 9 to 14, pages 32 to 37, include representative architectural drawings of the Site B building). The building would include about 85,000 sq.ft. of residential use and approximately 9,900 sq.ft. of ground floor retail use. The remainder of the space would be used for residential storage, lobby and parking. There would be a parking garage for about 65 self-park or 85 valet spaces in two levels below grade. Garage access would be from Washington Street; the main building entrance would be on Columbus Avenue.

Previous Project on Sites A and B: The project proposed in the Final EIR (FEIR) was for a 14-story office and residential structure (with ground floor retail and parking) on



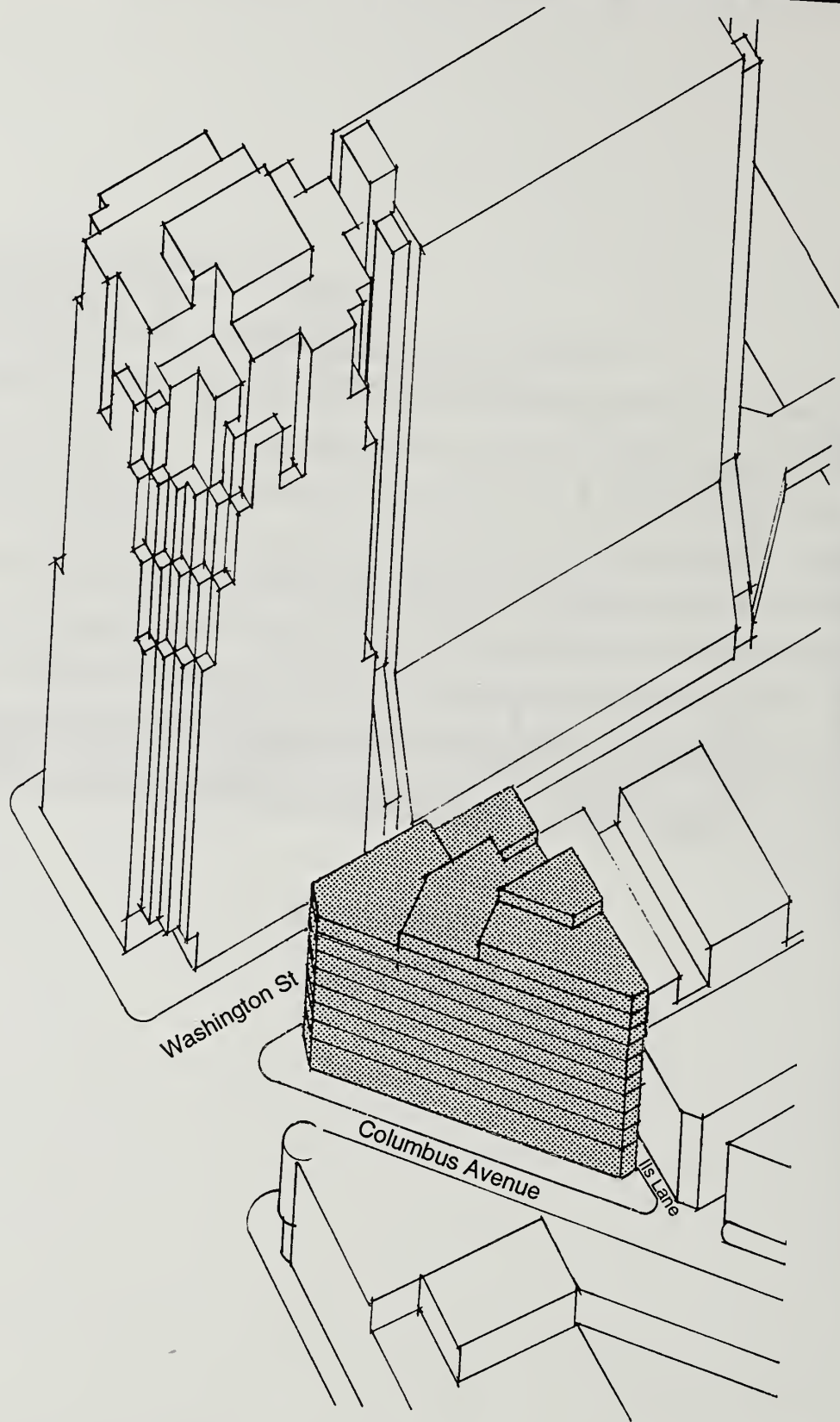
Source: James Stephen Titus AIA

SITE B, WASHINGTON STREET ELEVATION FIGURE 9



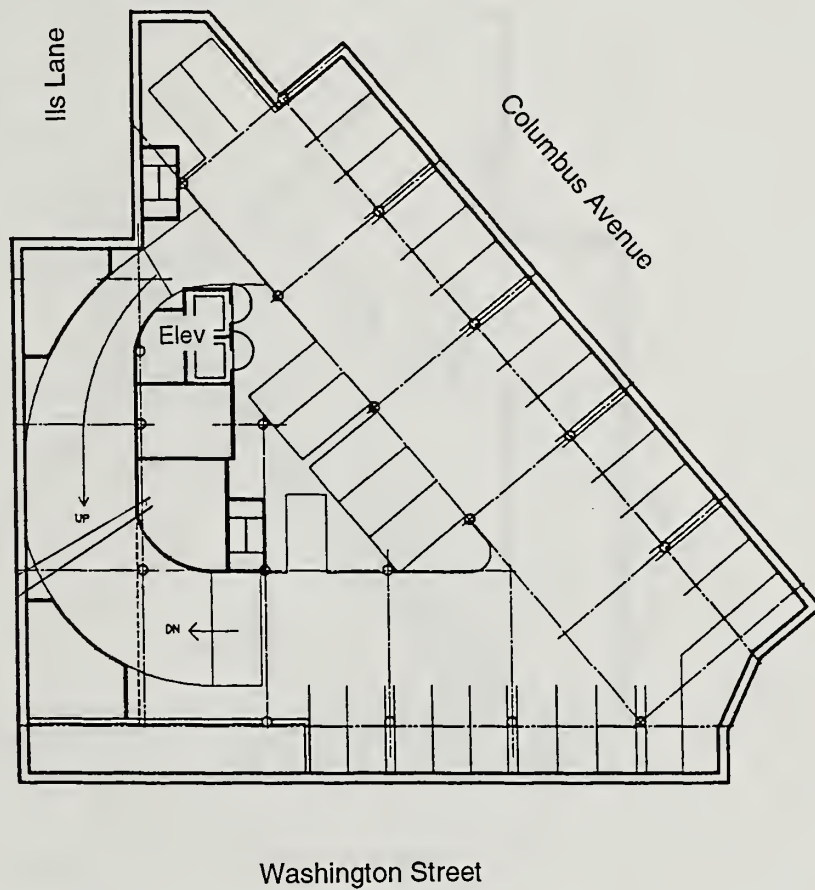
Source: James Stephen Titus AIA

SITE B, COLUMBUS AVENUE ELEVATION FIGURE 10



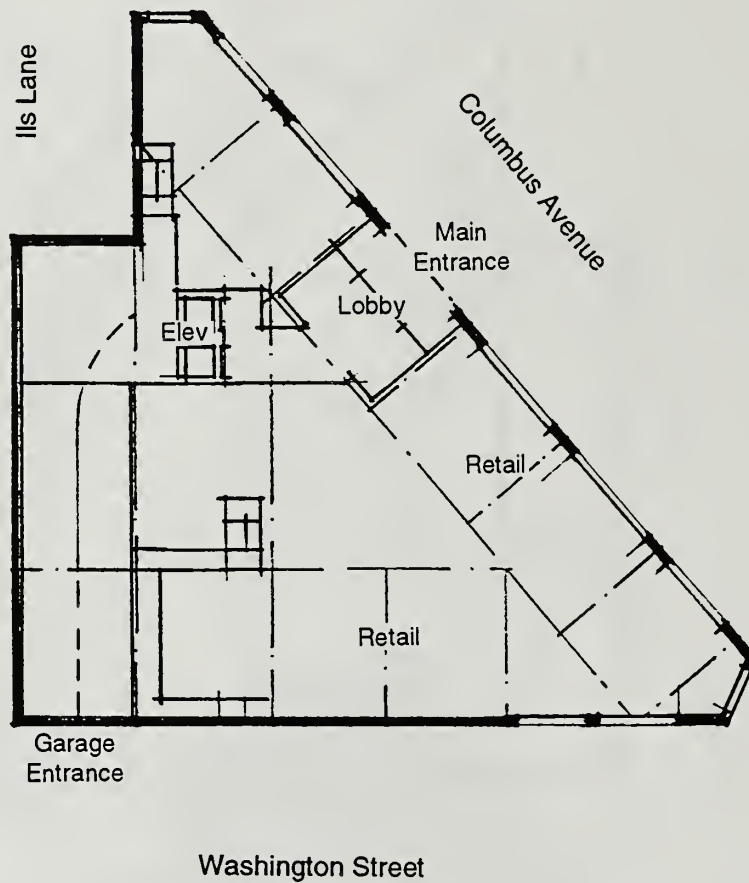
Source: James Stephen Titus AIA

SITE B, AXONOMETRIC **FIGURE 11**



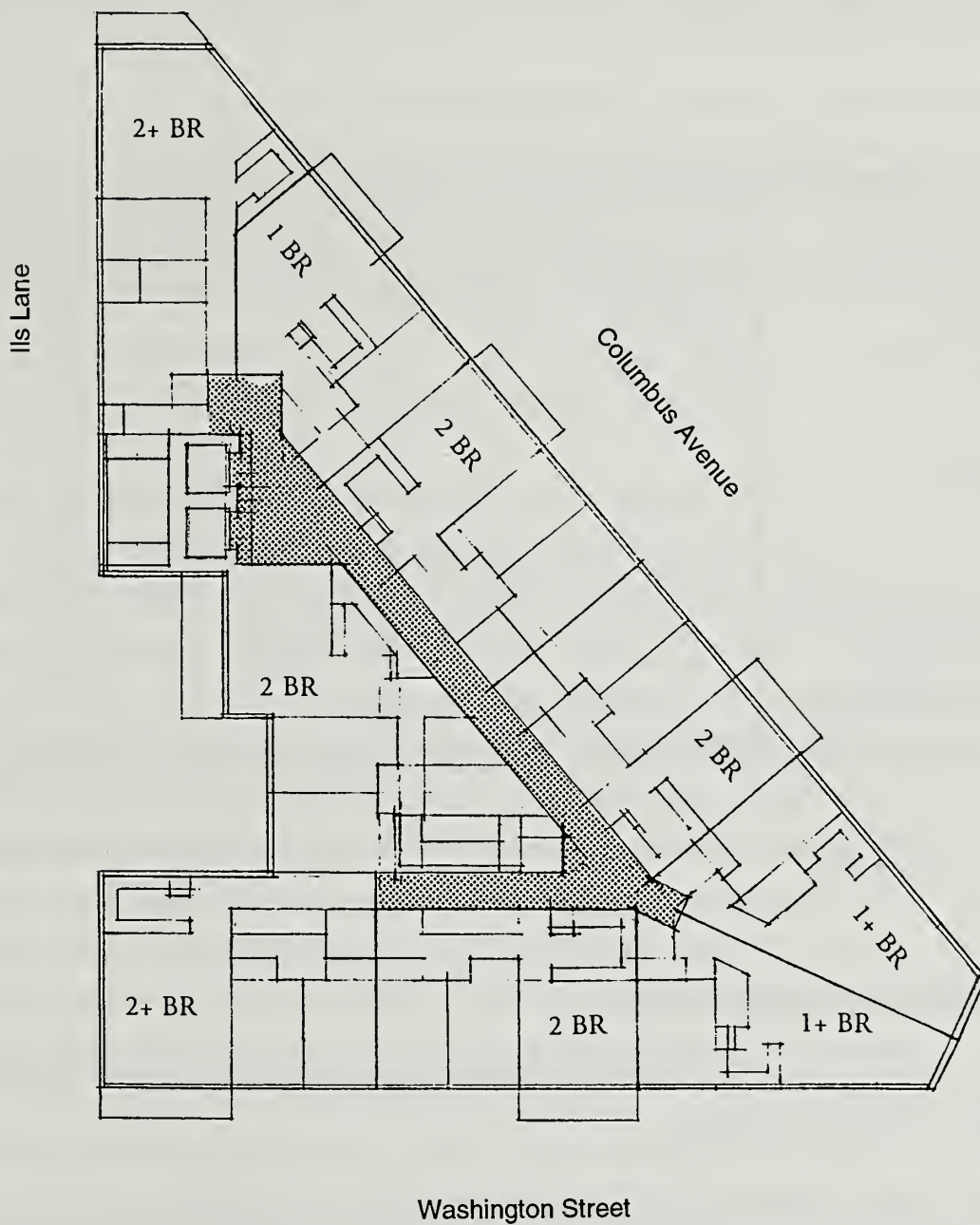
Source: James Stephen Titus AIA

SITE B, BASEMENT LEVEL PARKING PLAN **FIGURE 12**



Source: James Stephen Titus AIA

SITE B, GROUND FLOOR PLAN FIGURE 13



Source: James Stephen Titus AIA

SITE B, TYPICAL FLOOR PLAN **FIGURE 14**

Site A and an eight-story office building (with ground floor retail and parking) on Site B. A comparison of the project previously proposed and the currently proposed project is shown in Table 1, below.

TABLE 1
COMPARISON OF FEIR PROJECT AND PROPOSED PROJECT

USE	FEIR		PROPOSED PROJECT	
	Site A	Site B	Site A	Site B
Office sq.ft.	96,800 sq.ft.	81,300 sq.ft.	none	none
Residential sq.ft.	53,700 sq.ft.	none	80,000 sq.ft.	84,500 sq.ft.
Retail sq.ft.	12,100 sq.ft.	9,500 sq.ft.	none	9,900 sq.ft.
Dwelling Units	120	none	105	70
Parking	108 valet or 54 self-park	31 valet or 15 self-park	-- 154 self-park	85 valet or 65 self-park
School/Community	none	none	59,000 sq.ft.	none
Approximate Height (excluding penthouse)	165 feet	94 feet	140 feet	94 feet
TOTAL PROJECT SQ.FT.	209,740 sq.ft.	109,960 sq.ft.	201,500 sq.ft.	132,500 sq.ft.

Source: During Associates, Gordon H Chong + Associates, Herman Stoller Coliver Architects, and James Titus.

D. HISTORY OF PROJECT SITE

The FEIR described the history of the site (pages 34 and 34a); it is partially presented in this chapter for information purposes.

Site A, the location of the former International Hotel has been at the center of the controversy and debate about San Francisco housing policy for many years. The International Hotel (I-Hotel), was a 164-room residential hotel providing long-term, low-cost housing to mostly elderly Asian tenants. The I-Hotel was purchased by the Four Seas Investment Corporation (the current owner of the project sites, known since 1993 as the Pan Magna Group) on September 15, 1973. In July of 1976, the Human Rights Commission requested that the San Francisco Housing Authority (SFHA) preserve the I-Hotel for low-income housing. In October of 1976, SFHA designated the site for low-income housing and offered to buy the I-Hotel; the offer, however,

was refused. The SFHA then secured a court order to take possession of the I-Hotel. The Four Seas Investment Corporation filed a legal challenge and the court ruled in its favor. The I-Hotel tenants were subsequently evicted on August 4, 1977, and the hotel was demolished in 1979.

During the next five years, a number of proposals and counter proposals for development of the I-Hotel site were made by the owners and by a mayor-appointed Citizens' Advisory Committee. In September 1984, the Mayor, the previous project sponsor and the I-Hotel Block Citizens' Advisory Committee signed a Memorandum of Understanding (MOU), whereby the project proposed in the FEIR would contain residential units for the elderly and the Mayor would commit \$1.5 million Community Development Block Grant funding. Elderly and disabled tenants displaced from the I-Hotel were to be given first priority for these units.

The FEIR for a residential, office and retail project proposed on the I-Hotel site and the adjacent lot to the south on Kearny Street (Site A), and an office and retail project proposed on the site of the Colombo building and the adjacent lot to the west on Washington Street (Site B), was certified by the City Planning Commission on June 4, 1987. A Planned Unit Development was approved on July 9, 1987 for a residential and retail building on Site A and an office and retail building on Site B. A demolition permit for the Colombo Building and site permits for Sites A and B were issued and remain active. From 1987 to 1993, a number of factors contributed to the failed implementation of this project: the entity that had proposed to purchase Site A from Pan Magna Group and develop that site withdrew from the transaction; construction did not start in time to meet the tax credit requirements for construction completion; the economic downturn in office demand hampered construction financing for the office/retail/commercial uses; and there was consideration of Redevelopment Agency designation of the project site block.

In early 1993, the proposed purchaser of Site A withdrew from the transaction with the Pan Magna Group. The St. Mary's Chinese Catholic Center and Schools presented a plan to develop Site A as a replacement for their unreinforced masonry building at Stockton and Clay Streets. The plan called for parking to be constructed below grade with the school and senior housing to be built above. A HUD Section 202 grant was obtained in the fall of 1994 by the Chinese Community Housing Corporation; the City also contributed housing funds through the Mayor's Office of Housing. In addition, the Pan Magna Group decided to seek an amendment to the previous Planned Unit Development (PUD) to obtain the option of developing a residential project on Site B if economic conditions do not allow for the office building to be constructed. In

December 1994, a new application for environmental evaluation was submitted to the City for the proposed project; that application was put on hold at the request of the various project sponsors and was reactivated in Spring 1996.

E. PROJECT SCHEDULE, COST AND APPROVAL REQUIREMENTS

PROJECT SCHEDULE

The proposed project may be constructed in stages, with the parking garage and housing on Site A to be completed by the end of 1998, followed by completion of the Catholic Center and school the following year. Site B would also be completed by 1999.

COST

The proposed project is expected to cost about \$20.5 million (1996 dollars). Site A would cost about \$13.7 million (\$6.8 million for the residential component, \$6.9 million for the Catholic Center). Site B would cost approximately \$6.8 million.

APPROVAL REQUIREMENTS

Following a public hearing before the City Planning Commission on the Draft Supplemental EIR, responses to written and oral comments will be prepared. The Supplemental EIR (SEIR) will be revised as appropriate and presented to the City Planning Commission for certification as to its accuracy, objectivity, and completeness. No permits may be issued or approvals granted before the Final SEIR is certified.

The *City Planning Code*, which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. The project sponsors are requesting approval of the project as an amendment to the Planned Unit Development (PUD) approved in 1987 under Section 304(a) of the *City Planning Code*. A PUD allows for development of sites greater than one-half acre in area. According to Section 304(a):

"The procedures for Planned Unit Developments are intended for projects on sites of considerable size, developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood, and the City as a whole. In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well reasoned modification of certain of the provisions contained elsewhere in this Code."

PUD's require conditional use authorization from the City Planning Commission. Under Code Section 304, as part of the proposed amendment to the PUD, the project sponsors will request authorization from the City Planning Commission for project approval and for the following exceptions and modifications to the *City Planning Code* (those items marked with an asterisk (*) were included in the approved PUD):

- To modify rear yard/site coverage requirements under Section 134.1 since the proposed buildings cover more than the Code-permitted 75 percent of the lots at the first residential level. Site A would provide this open space on roof top terraces. Site B would provide the open space at the lowest level of dwelling unit occupancy. The Zoning Administrator will be asked to determine, under this section, that the buildings would not significantly impair light and air to adjacent properties.
- * ● To exceed the 65-foot-height limit of the 65-D-2 Height and Bulk District up to but not exceeding 200 feet, pursuant to Code Section 263.1, for the housing structures for both sites (structures should be sited to produce a stepping down of height; should avoid excessive bulk, intrusiveness or continuous wall that would adversely affect views, penetration of sunlight or pedestrian amenity; and should respect the historic and architectural character of Jackson Street).
- For Sites A and B, to exceed 35 feet in height in the Chinatown Mixed Use Districts pursuant to Section 254.
- * ● For Site A to encroach into the required 15-foot setback at the 52-foot building height level called for in Section 132.3 to provide sun access to the adjacent Kearny Street sidewalk requiring provision of a compensatory increase in sunlight on the sidewalk in the same block achieved by a reduction of height and volume elsewhere in the structure.
- * ● For both sites to exceed a 5,000 sq.ft. lot size limit, pursuant to Section 121.3.
- For Site A to exceed the 4,000 sq.ft. per commercial use size limit (for the garage) in the Chinatown Residential/Neighborhood Commercial (CR/NC) District, pursuant to Section 121.4.
- For Site B to potentially exceed the 5,000 sq.ft. per commercial use size limit in the Chinatown Community Business District, pursuant to Section 121.4.
- To provide an in-lieu payment if required open space for nonresidential/institutional uses in Chinatown is not provided, pursuant to Section 135.1.
- * ● To exceed a street frontage of 50 linear feet, pursuant to Section 145.3, on Jackson and Kearny Streets for Site A and on Washington Street and Columbus Avenue on Site B.
- * ● To exceed the bulk limits above a height of 40 feet, which are a maximum plan length of 110 feet and a maximum diagonal dimension of 140 feet, pursuant to Sections 270 and 271. This exception applies to the plan length and diagonal dimension for the school on Site A and the plan length and diagonal dimension for the housing on Site B.

- To deviate via an exception from the parking requirement for senior housing by providing one parking space where 23 are required by Sections 151(j), 154, 155(i) and 209.1(m).
- An off-street parking variance for 22 parking spaces would be addressed as an exception in the PUD process.)
- To deviate from parking requirements by providing required parking off-site and by use of valet parking, pursuant to Sections 151, 154, 155(i), 155(j), and 161(c).
- For the 220,000 sq.ft. of development on the combined Sites A and B, one off-street freight loading space would be required by Section 152, Table 152, to serve the overall development and none is proposed.
- To provide a community parking garage in the Chinatown Residential/Neighborhood Commercial (CR/NC) District, pursuant to Sections 812 and 890.11.

If it is determined that a Conditional Use authorization for a community parking garage is not appropriate, the Planning Commission and Board of Supervisors may be requested to approve an ordinance to amend the text of the *City Planning Code* to allow commercial parking as a conditional use in low-income residential and educational projects in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District which have received a commitment for Community Development Block Grant funds as of January 10, 1985.

The City Planning Commission would hold a public hearing to consider the project's application for Conditional Use authorization in accordance with Sections 303 (Conditional Uses) and 304 (Planned Unit Development) of the *City Planning Code*, and would adopt, as an amendment to the existing PUD, a motion approving, approving with conditions, or disapproving the project.

The project sponsors would seek a 10-foot encroachment under the sidewalks on Kearny, Jackson, Washington Streets and Columbus Avenue for the below grade parking garages and utility vaults. The encroachment would be reviewed by the Department of Building Inspection for conformity to the Department of Public Works' requirements.

On November 4, 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *City Planning Code* and established eight Priority Policies. These policies are preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable

housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project that requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, during the review and approval process for the project, including Conditional Use authorization, will make a determination of the project's conformance with the Priority Policies, and will so advise any other approving bodies.

The proposed project would involve demolition of the Colombo Building, which is neither a landmark nor a contributory building in an historic district. It was deemed potentially eligible for National Register status as a cultural/historic resource by the State Office of Historic Preservation based on the 1982 North Beach Survey. Pursuant to the historic preservation portion of *City Planning Code* Section 101.1 and because of the building's immediate proximity to other landmark-designated buildings and to the Jackson Square Historic District, the Landmarks Preservation Advisory Board (LPAB) would review the proposed project and advise the City Planning Commission. LPAB review includes a public hearing.

If the project were approved by the City Planning Commission, the project sponsors must obtain building and related permits from the Department of Building Inspection, and a new or amended demolition permit may be needed regarding the Colombo Building.

The Department of Parking and Traffic must approve the proposed loading zones (white curbs) on Kearny Street (Site A) and Columbus Avenue (Site B) in front of the main entrances to the project.

- The Department of Public Works' Bureau of Streets and Sidewalks and the Board of Supervisors must review and approve the school drop-off curb cut on Kearny Street for Site A.
- The proposed senior housing for Site A would be funded by the U.S. Department of Housing and Urban Development (HUD), and therefore, the project will undergo federal environmental review as required by the National Environmental Quality Act (NEPA). This additional environmental review includes Section 106 review pursuant to the National Historic Preservation Act of 1966.

A finding of adverse effect would require the execution of a formal Memorandum of Agreement (MOA) between the lead agency, the project sponsor, the Planning Department as the Certified Local Government (CLG), the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP). The MOA would set forth stipulations designed to mitigate the adverse effects of the project's implementation on historic resources.

III. ENVIRONMENTAL SETTING

This chapter considers the same environmental categories as those addressed in the 1987 Final EIR (FEIR) and indicates the changes that have subsequently occurred in the environmental setting. These areas include land use and zoning, urban design and site visibility, shadow and wind, historic, architectural and cultural resources, transportation, air quality, and employment and housing. Nearly ten years have passed since certification of the FEIR and portions of the environmental setting have changed since that time. The existing physical setting near the project area has remained fairly constant in terms of land uses, urban design and historic, architectural and cultural resources. The Loma Prieta earthquake in 1989, the demolition of the Embarcadero Freeway, demographic changes and fluctuations in the economy have had an effect on the City's transportation, air quality, and employment and housing conditions. Each section in this Supplemental EIR (SEIR) presents current information regarding existing conditions and identifies material from the FEIR that is still relevant.

A. LAND USE AND ZONING

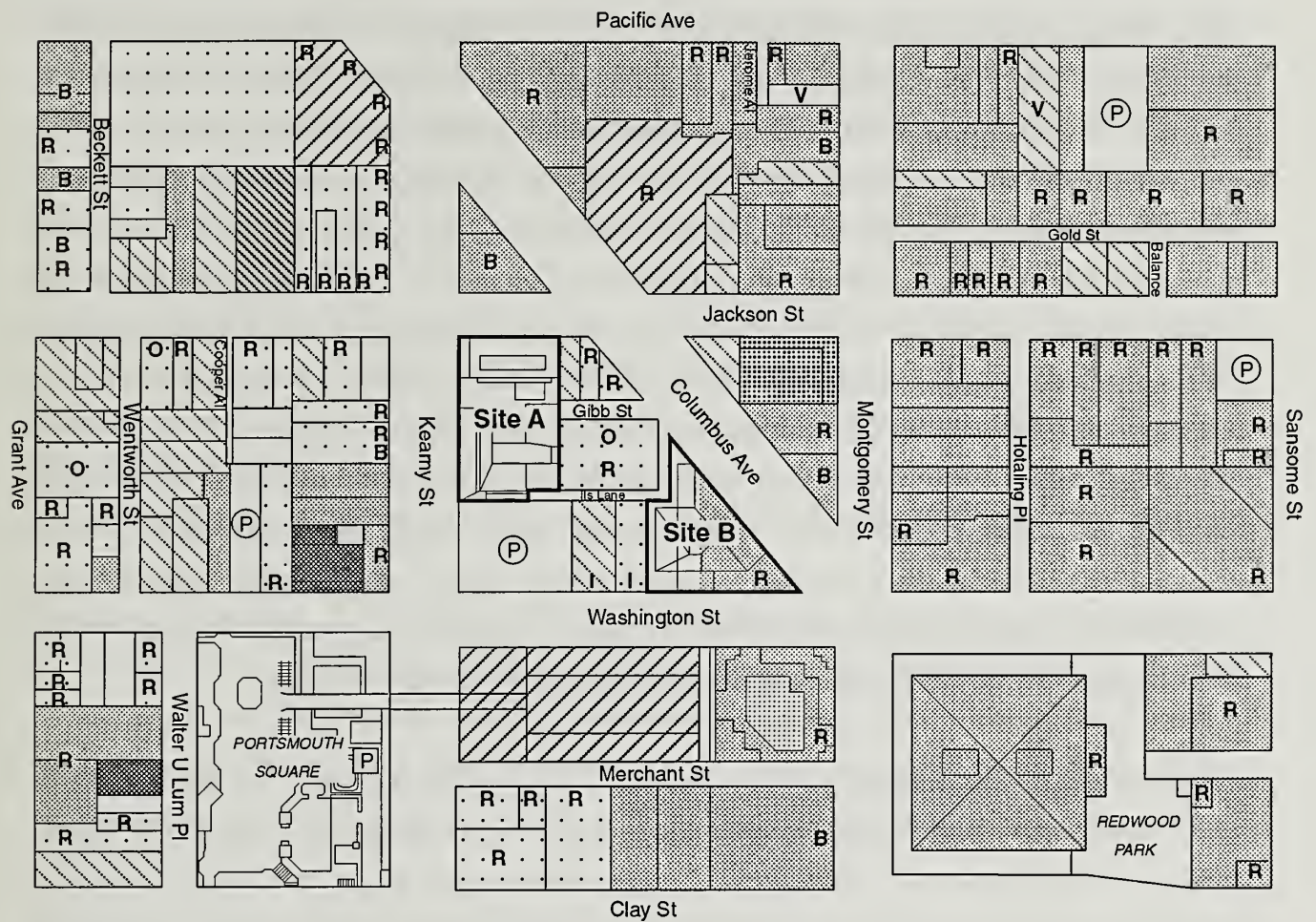
LAND USE

The Land Use and Zoning setting section of the FEIR (pages 38 to 44) accurately described the central location of the project site at the juncture of four city districts: North Beach, Chinatown, Jackson Square and the Financial District. The description of the types of development and land use patterns that characterized these areas is also still accurate: North Beach is typified by low-rise, multi-family residential buildings with ground floor retail; the main commercial streets are Columbus Avenue and Broadway; historic low-rise Jackson Square is to the east; the dense mixture of low-rise commercial and residential uses in Chinatown are to the west; and to the south are the high-rise structures in the Financial District that contain office, retail and some residential uses. The FEIR described what was then new development occurring in the project

area, including projects approved but not yet under construction, projects under construction, and recently completed projects. This list included 801 Montgomery Street, the Columbus/Pacific office building, 900 Kearny Street, 50 Osgood Place, 505 Montgomery Street and the Bank of Canton. These primarily office developments have all been completed for over five years and now form part of the urban fabric of the area.

Some of the specific land uses adjacent to the project site have changed since the FEIR. Figure 15, page 46, is an updated version of Figure 15 from the FEIR, reflecting the current land uses in the immediate project area. In the block immediately west of the project site on Kearny Street, a theater and retail/restaurant use have been converted to office use, and the building on the southwest corner of Kearny and Jackson Streets has been demolished and is now a vacant lot one level below grade. Immediately to the north of the project site across Jackson Street is 900 Kearny, a six-story office building with a ground floor bank use, that was constructed on a former parking lot adjacent to the Landmark-designated Columbus Tower Building. To the east of the project across Columbus Avenue, a church/religious organization use has been changed to office above retail. Elsewhere in the project area as shown in Figure 15, there are several ground floor retail/restaurant uses that have replaced office use.

As noted in the FEIR, development of the project is proposed on two sites connected by IIs Lane. Site A is located at the southeastern corner of the intersection of Kearny and Jackson Streets; Site B is located at the northwestern corner of the intersection of Washington Street, Columbus Avenue, and Montgomery Street. The International Hotel (I-Hotel) and the Victory Hotel, both residential hotels, were located at Site A until they were demolished in 1979; Site A remains vacant at present, and appears as a pit extending approximately 12 feet below street grade. The Bell Hotel, a 70-unit residential hotel, was located on a portion of Site B prior to its demolition in 1979; this portion of the site remains vacant at present, and also appears as a pit extending approximately 10 feet below street grade. The remainder of Site B is occupied by the two-story Colombo Building, which contains approximately 5,800 sq.ft. of ground floor retail and commercial uses, and 5,800 sq.ft. of second-floor office space. Businesses which currently occupy the building include small restaurants, an office supply retailer, a barber shop, several private offices, and a dry-cleaner. Other uses in the project block are similar to those described in the FEIR.



LEGEND

	Office		Hotel	Ground Floor use (when different from primary use)	
	Residential above Office		Church/Religious Organization		
	Residential		Vacant Building	R	Retail/Restaurant
	Bank		Vacant Lot	B	Bank
	Retail/Restaurant		Parking Lot	O	Office
	Theater		Parking Lot below grade	I	Light Industrial



Source: During Associates after ESA

EXISTING LAND USES FIGURE 15

The FEIR described two community-prepared plans for Chinatown, which were instrumental to the development of the Chinatown Area Plan, an area plan of the *San Francisco General Plan* adopted on February 19, 1987. The FEIR described the objectives and policies from the area plan which have bearing on the project; however, due to changes in the project characteristics, the project's relationship to these objectives and policies requires updating. Policy 1 of Objective 1 states, "maintain the low-rise scale of Chinatown's buildings." The proposed project would include heights up to about 162 feet (plus penthouse), which could be permitted with Conditional Use (CU) authorization in the 65-D-2 height and bulk district. Policy 1 of Objective 4 states, "protect and enhance neighborhood-serving character and commercial uses in predominantly residential areas." The project would provide about 9,900 sq.ft. of retail space, which is intended for neighborhood-serving retail and restaurant uses. Policy 1 of Objective 2 (referred to in the FEIR as Policy 2 of Objective 4) states, "promote a building form that harmonizes with the scale of existing buildings and width of Chinatown's streets." While the design of the proposed project has changed, the analysis of the relationship to this policy remains accurate.

The FEIR describes the earlier project's relationship to Objective 3, Policy 1, of the Commerce and Industry Element of the *San Francisco General Plan*, which states, "promote the attraction, retention and expansion of commercial . . . firms which provide employment opportunities for unskilled and semi-skilled workers." The proposed development no longer includes 12,100 sq.ft. of retail use and 96,800 sq.ft. of office use on Site A. The relocated St. Mary's Chinese School and the Catholic Center uses are now proposed for that part of Site A. The proposed development would displace about 11,600 sq.ft. of existing office and retail businesses in the Colombo Building, which provided a range of employment opportunities. The proposed structure on Site B would include approximately 9,900 sq.ft. of new ground-floor retail uses, which could provide employment opportunities for unskilled and semi-skilled workers; however, not to the extent of the project described in the FEIR. Thus, this objective is no longer applicable to the proposed project. Policies 1 and 2 of Objective 6 of this element deals with "growth of prime downtown office activities" and the maintenance of a "compact downtown core." This discussion is no longer applicable to the project, because the current proposal does not include development of commercial office space.

The FEIR (page 42) described the earlier project's relationship to several objectives and policies contained in the Residence Element of the *San Francisco General Plan*. An update of this element was adopted by the City on September 13, 1990. For this reason, and because of

changes in the proposed mix of uses at the site, that description is no longer accurate. The project would respond to several objectives and policies contained in the current Residence Element and Chinatown Area Plan of the *San Francisco General Plan*, including Resident Element Objective 1, which seeks “to provide new housing, especially permanently affordable housing, in appropriate locations which meets identified housing needs”; Resident Element Objective 2, which seeks “to increase the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods”; Resident Element Objective 5, “to provide housing affordable by all income groups, particularly low and moderate income households”; Resident Element Objective 6, “to provide a quality living environment”; Chinatown Area Plan Objective 3, “to stabilize and where possible increase the supply of housing”; and Chinatown Area Plan Objective 4, “to preserve the urban role of Chinatown as a residential neighborhood.”

The proposed project would provide a mix of permanently-affordable and market-rate housing, in an area where the need for additional housing of these types has been identified. The provision of housing in this area would not overcrowd or adversely affect the prevailing character of existing neighborhoods, including those of Chinatown and North Beach. These characteristics are in conformity with the updated Residence Element and the Chinatown Area Plan.

ZONING

The project site includes the following zoning districts: Site A is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District; and Site B is in the Chinatown Community Business (CCB) Use District. The description of zoning controls for the project in the FEIR (pages 43 and 44, including Figure 16, Planning Code Use, Height and Bulk Districts) are still accurate with one exception: the area designated C-3-G south of the project site in Figure 16, page 44 of the FEIR, is presently CCB (Chinatown Community Business). The residential and institutional (school and chapel) portions of the project would be exempt from floor area-ratio (FAR) limits of both the CR/NC and the CCB Use Districts. The FAR of the underlying zoning, which is 10:1, would apply to the garage and community uses.

B. URBAN DESIGN AND SITE VISIBILITY

The urban design context and site visibility, described on pages 45 and 47 of the FEIR, are generally applicable to the present day setting. The project block is situated in an area where lower-scale development of the older North Beach, Chinatown and Jackson Square communities

about the high-rise development of the Financial District. Figure 16, page 50, contains current photographs of the project site, replacing Figure 17 (page 46) in the FEIR. The six-story, 900 Kearny Building on Jackson and Kearny Streets and Columbus Avenue, directly across from Site A to the north, is the most notable change in the urban design framework since the 1987 FEIR.

As noted on page 47 of the FEIR, views to the north and west of the two sites are characterized by low-rise retail and office buildings. The higher ground of Telegraph Hill terminates the view to the north and views to the south and east are blocked by newer high-rise buildings. In addition to the new building north of the project site on Jackson Street, the site on the southwest corner of Jackson and Kearny Streets formerly contained a two-story building which has been demolished. On the northwest corner of Jackson and Montgomery Streets, a five-story building has been constructed (the site was shown as vacant in Figure 17A on page 47a in the FEIR). Other building heights described in the FEIR are still accurate.

C. SHADOW AND WIND

SHADOW

On pages 49 and 50, the FEIR accurately describes the existing shadow conditions of the project site. Since Site A is vacant, no shadows are cast from this site. The two-story Colombo Building on Site B casts shadows on surrounding streets and sidewalks north of the intersection of Columbus Avenue and Washington Street.

As noted in the FEIR, Portsmouth Square, located one-half block southwest of the project site, is the closest property under the jurisdiction of the Recreation and Park Commission (and, thus, protected by *City Planning Code* Section 295, Proposition K). The existing and proposed project shadow patterns for various times of the day and year are discussed in Chapter IV, Environmental Impacts on pages 67 to 77.

WIND

The discussion on pages 50 and 51 of the FEIR of the existing wind conditions in the City, pedestrian comfort and wind criteria, and the standards set forth in Section 148 of the *City Planning Code*, is applicable to current conditions. The prevailing winds in San Francisco blow



Source: Square One Productions

PHOTOGRAPHS OF PROJECT SITES **FIGURE 16**

from the west and northwest. Average wind speeds are highest during summer months and lowest during winter months; strongest peak winds occur, however, in winter, when speeds of 47 m.p.h. have been recorded. Section 148 establishes an equivalent (includes the effects of turbulence) windspeed criteria as 7 m.p.h. for seated pedestrian comfort, and 11 m.p.h. for walking pedestrian comfort.¹ No building would be permitted to exceed the 26 m.p.h. wind hazard level for more than a single hour of any year.

The existing and project-generated wind conditions are addressed in Chapter IV, Environmental Impacts on pages 77 to 79.

NOTES - Shadow and Wind

¹ Although Section 148 applies to C-3 Districts, the proposed project is across the street from a C-3 District and it is reasonable to apply the same wind criteria.

D. HISTORIC, ARCHITECTURAL AND CULTURAL RESOURCES

HISTORIC/ARCHITECTURAL RESOURCES

The discussion in the FEIR on pages 52 to 55 regarding Historic and Architectural Resources is still accurate. The project site is located immediately west of the Jackson Square Historic District. The Chinatown Historic District was proposed in 1985, but was never acted on by the City Planning Commission or the Board of Supervisors. The project site is adjacent to the north end of this proposed district. About 15 buildings within a one-block radius of the project site are rated on the 1976 Department of City Planning Architectural Inventory. Seventeen nearby buildings are designated City Landmarks and eleven buildings within one block west of Site A, plus the Colombo Building, are identified as architecturally significant in the Chinatown Area Plan of the *San Francisco General Plan*. Chapter X, Appendix A, pages A.1 to A.3, details the rating system used by the 1976 DCP inventory.

The only building on the project sites is the Colombo Building, rated "3" in the 1976 Department of City Planning Architectural Inventory and "B*" by the Foundation for San Francisco's Architectural Heritage.¹ In May 1984, the Landmarks Preservation Advisory Board (LPAB) recommended City Landmark Status for the Colombo Building, but no formal designation by the City has taken place. The Colombo Building was evaluated as part of the 1982 North Beach Survey and was determined to be potentially eligible to be placed in the National Register of Historic Places (NRHP). The State Office of Historic Preservation concurred in this identification

in 1996 and rated the building "4S." In the NRHP status codes, the "4S" rating implies that the building may become eligible for separate listing in the National Register when more historic or architectural research is performed on the property.² Figure 20 on page 54 of the FEIR should be amended to note the additional evaluation of the Colombo Building.

CULTURAL RESOURCES³

The description in the FEIR on pages 55 to 57 of the prehistoric and historic resources of site is still accurate. There are no recorded prehistoric sites near the project sites. Research suggests that Native American Indians lived nearby and frequented the project area, and the project sites have been near the heart of San Francisco's development since the City's colonial days. Field studies on Site A revealed an intact gold rush site with a comprehensive assemblage of well-preserved artifacts (in excess of 10,000 specimens) from the mid-19th Century era. Prior to 1979, the I-Hotel provided low-income housing to mostly Asian, particularly Filipino, elderly tenants. The project sites are in an area formerly referred to as "Manilatown" because of the large number of Filipinos who lived in the vicinity.

NOTES - Historic, Architectural and Cultural Resources

¹ The Colombo Building was rated "B*" by Heritage in its extended survey. The "B*" rating was given to the Colombo Building because of the alterations to the structure which affect its integrity; B* means if these alterations were reversed or removed, the building would be rated "A" by Heritage.

² *Kearny Street/Columbus Avenue Project, Historic Resources Study*, Page & Turnbull, Inc., August 1996.

³ Allen G. Pastron, Ph.D, of Archeo-Tec, consulting archaeologists, conducted archival research for both project sites and the surrounding area. Three reports: *Cultural Resources Evaluation: Pan Magna Development Project San Francisco, California*, June 1995; *Pan Magna Plaza: Pre-construction Archaeological Testing Program*, December 29, 1987; and *Archaeological Data Recovery Program Conducted Within Site A of the Kearny/Columbus Site, San Francisco, California*, February 1996, are on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

E. TRANSPORTATION

The discussion in the FEIR on pages 57 to 60 is outdated. Traffic conditions in the project area and in San Francisco have changed to the extent that a new transportation analysis of the project is warranted. This section addresses the current transportation setting for the project area and the City.

The project site is located on the block bounded by Kearny Street, Jackson Street, Washington Street, and Columbus Avenue, at the confluence of the North Beach, Chinatown and the Financial Districts (see Figure 1, page 23). These streets, as well as Montgomery Street and Broadway, provide primary access to and from the site. Within the project block are two minor stub streets (Gibb Street and IIs Lane), and an off-street surface parking facility for about 80 cars.

The project site is located in one of four traffic analysis zones established by the Metropolitan Transportation Commission (MTC) in the City and County of San Francisco; Superdistrict 1, in which the site is located, extends westward to Van Ness Avenue, southward to Townsend Street, and northeastward to the Bay.

Changes to San Francisco's regional transportation network were brought about by the 1989 Loma Prieta earthquake, and included closure and/or demolition of several freeways and associated facilities. Recent work has included reopening of the section of I-280 between Cesar Chavez Street (Army Street) and U.S. 101, demolition of the Terminal Separator Structure (a series of on- and off-ramps linking the Bay Bridge with surface streets in the vicinity of Mission, Main and Beale Streets), demolition of a portion of the Central Freeway between Turk and Fell Streets, and demolition of the Embarcadero Freeway (I-480). The Embarcadero Freeway provided regional freeway access for neighborhoods in the northeast sector of the City, including Chinatown and North Beach, with the on/off-ramps on Washington and Clay Streets approximately three blocks east of the project site. The City is currently studying the alternatives for replacement of the Terminal Separator Structure and the Embarcadero Freeway (and realignment of the Embarcadero Roadway), as well as options for replacement of the damaged Central Freeway. These projects are expected to be completed by the year 2000.

Kearny Street is a discontinuous north-south street running from Market Street to Fisherman's Wharf (Site A has Kearny Street frontage). In the vicinity of the project site, Kearny Street is one-way northbound; it is identified in the *San Francisco General Plan* as a major arterial and a Transit Preferential Street. Transit Preferential Streets are considered important for transit operations where interference with other traffic should be minimized.¹

Columbus Avenue is a two-way, northwest-southeast boulevard running from Montgomery Street to Beach Street (Site B has Columbus Avenue frontage). The *San Francisco General Plan*

identifies Columbus Avenue as a major arterial, a Transit Preferential Street, a Citywide Pedestrian Network Street, a Neighborhood Pedestrian Street, and a Citywide Bicycle Route.

Jackson Street is a one-way, eastbound street running adjacent to the project site (Site A has Jackson Street frontage). Some segments of Jackson Street (outside the project area) have *San Francisco General Plan* Transit Preferential Street designations, and the Powell & Hyde Street Cable Car runs along Jackson Street in the Nob Hill area. In the vicinity of the project site, Jackson Street provides local access between Chinatown and Jackson Square.

Montgomery Street, which runs in a north-south direction, is a one-way southbound street south of its intersection with Columbus Avenue and Washington Street (adjacent to the site), and a two-way street north of this intersection. Between Washington Street and Bush Street, Montgomery Street is a designated major arterial and Transit Preferential Street; between Washington Street and California Street, it is designated a Citywide Pedestrian Network Street.

Broadway is a two-way, east-west boulevard located two blocks north of the project site. Within the vicinity of the site, Broadway is designated as a major arterial (between Franklin Street and The Embarcadero), and a Citywide Bicycle Route (between Webster Street and The Embarcadero).

The project site is well served by the San Francisco Municipal Railway (MUNI), and regional transit operators. Stops for approximately 12 MUNI bus lines are within walking distance of the project site; MUNI provides crosstown and radial service with diesel and electric coaches to and from the Downtown area.² Figure 17, page 55, shows transit routes in the project area. The closest MUNI stops to the project site are on site frontages: the southeast corner of the Jackson/Kearny intersection (serving lines 9X, 9AX, 9BX (San Bruno Express routes), and 15-Third Street); the southwest corner of the Columbus/Jackson intersection (serving lines 15-Third Street, 30X-Marina Express, and 41-Union Street); and the northwest corner of the Columbus/Montgomery/Washington intersection (serving lines 15-Third Street and 30X-Marina Express). Golden Gate Transit (Marin County service) has several lines running along Sansome and Battery Streets, respectively one and two blocks east of the project site. Alameda County (AC) Transit (East Bay service), SamTrans (Peninsula service), and CalTrain (Peninsula service) do not serve the project site directly, but may be reached by transferring from the appropriate MUNI lines. The Downtown Ferry Terminal, located approximately six blocks east of the project site, provides regional ferry service from San Francisco to landings in Oakland, Vallejo, Larkspur, and Sausalito.



MUNI ROUTES IN THE PROJECT VICINITY **FIGURE 17**

Pedestrian facilities are provided throughout the project area. Weekday PM peak hour pedestrian counts were taken in November 1995, for the four crosswalks at the Kearny/Jackson and Kearny/Washington intersections. These crosswalks currently operate at Level of Service (LOS) B or better, during the peak period.³

Parking within the project area consists of metered and unmetered on-street parking spaces, and publicly accessible off-street lots and garages. On-street parking in the area consists of one-hour and two-hour spaces, which are generally well utilized and have a high turnover rate. There are approximately 2,043 off-street parking spaces in 18 garages and lots in the project area, with a weekday (midday) utilization rate of about 91 percent (based on surveys conducted in November, 1995).

NOTES - Transportation

¹ Transportation Element, *San Francisco General Plan*, amended July 1995, pages 32, 43 and 59.

² Walking distance is considered one-quarter mile.

³ A LOS A indicates a condition where pedestrians move in desired paths without altering their movements in response to other pedestrians, walking speeds are freely selected, and conflicts between pedestrians is unlikely. An LOS B indicates a condition where sufficient area is provided to allow pedestrians to freely select walking speeds, to bypass other pedestrians, and to avoid crossing conflicts with others. At LOS B, pedestrians begin to be aware of other pedestrians, and to respond to their presence in the selection of walking path.

F. AIR QUALITY

The following setting information on air quality reflects the current conditions in San Francisco. The section on air quality in the FEIR on pages 60 to 63 is outdated and inappropriate for the EIR.

The Bay Area Air Quality Management District (BAAQMD) operates a regional monitoring network that measures the ambient concentrations of six air pollutants: ozone (O₃), carbon monoxide (CO), fine particulate matter (PM₁₀), lead (Pb), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂). On the basis of the monitoring data, the Bay Area had been designated a "non-attainment" area with respect to the Federal O₃ and CO standards. The Bay Area recently was recently redesignated by the U.S. Environmental Protection Agency (EPA) a "maintenance area" for ozone, while a request for redesignation to "maintenance area" for CO has been submitted to the EPA. The air basin is either an attainment area or is unclassified for all other national ambient air quality standards. San Francisco has experienced violations of the State 8-hour CO and PM₁₀

standards. A 4-year summary of data collected at the BAAQMD monitoring station at 10 Arkansas Street (a few miles southeast of the project site near 16th Street) is shown in Chapter X, Appendix D, together with the most stringent corresponding State and/or Federal ambient air quality standards in San Francisco. From 1991 to 1994, no violations occurred of either the 1-hour or 8-hour State and Federal CO standards, or the standards for O₃, NO₂, SO₂, or lead. The State PM₁₀ standard was exceeded on between 5 and 15 days each year during the 4-year period of 1991 to 1994; the Federal PM₁₀ standard is less stringent and was not exceeded.

CO concentrations are monitored both at the 10 Arkansas Street monitoring station and at BAAQMD headquarters at 939 Ellis Street. Monitored levels at 939 Ellis Street, which is located near the heavily travelled Van Ness Avenue corridor, should be representative of the project site.

PM₁₀ levels are relatively low near the coast and increase with distance from the coast, peaking in dry, sheltered valleys. The primary sources of PM₁₀ in San Francisco are construction and demolition, combustion of fuels for heating, and vehicle travel over paved roads.¹

Comparison of these data with those from other BAAQMD monitoring sites indicates that San Francisco's air quality is among the least degraded of all developed portions of the Bay Area. Three of the prevailing winds, west, northwest, and west-northwest, blowing off the Pacific Ocean, reduce the potential for San Francisco to receive air pollutants from elsewhere in the region.

Before 1989, occasional violations of the State/Federal 8-hour standard for CO were recorded annually. CO is a non-reactive air pollutant, the major source of which is motor vehicles. CO concentrations are generally highest during periods of peak traffic congestion.

San Francisco, like all other subregions in the Bay Area, contributes to regional air quality pollutants, primarily O₃, in other parts of the Bay Area. O₃ is not emitted directly from air pollutant sources, but is produced in the atmosphere over time and distance through a complex series of photochemical reactions involving hydrocarbons (HC) and nitrogen oxides (NO_x), which are carried downwind as the photochemical reactions occur. O₃ standards are violated most often in the Santa Clara, Livermore, and Diablo Valleys, because local topography and meteorological conditions favor the build-up of O₃ precursors there.

In 1990, emissions from motor vehicles were the source of 76 percent of the CO, 46 percent of the HC, 4 percent of the PM₁₀, 18 percent of the SO₂ and 55 percent of the NO_x emitted in San Francisco.² These percentages are expected to apply reasonably well to current conditions, although the amount of pollutants may have changed.

The Federal Clean Air Act and the California Clean Air Act of 1988 require that the State Air Resources Board, based on air quality monitoring data, designate portions of the state where the Federal or State ambient air quality standards are not met as "non-attainment areas." Because of the differences between the national and State standards, the designation of non-attainment areas is different under the Federal and State legislation.

The Bay Area has both a Federal and State air quality plan. Both plans propose the imposition of controls on stationary sources (factories, power plants, industrial sources, etc.) and Transportation Control Measures designed to reduce emissions from automobiles.

NOTES - Air Quality

¹ Bay Area Air Quality Management District, *Base Year 1990 Emissions Inventory Summary Report*, October 1993.

² Ibid.

G. EMPLOYMENT AND HOUSING

The Employment and Housing setting section of the FEIR (pages 63 to 76) described the project area and regional characteristics for employment and housing in 1987. This section provides current information pertaining to employment, the commercial rental market in downtown San Francisco (office vacancy rates and rents) and the housing conditions in Chinatown. The 1987 information on commercial development and employment is no longer up to date and is completely replaced with the following discussion. Housing in Chinatown has changed less so, and is merely augmented and updated below.

EMPLOYMENT

The 1995 *Commerce and Industry Inventory* report, the third annual inventory prepared by the San Francisco Planning Department, provides economic information related to the Commerce and Industry Element of the *San Francisco General Plan*. As part of its analysis of employment trends in the City, it summarizes the relatively sharp decline in employment that occurred

between 1990 and 1993, partially resulting from one of the worst post-war recessions affecting national, state and local economies. During this period, San Francisco employment declined by about 37,400, or seven percent, to 521,500.

At the time that the Embarcadero Freeway was closed and then removed, following the Loma Prieta earthquake in 1989, there was a drop-off in business revenues in the commercial areas of Chinatown, North Beach and Fisherman's Wharf, particularly for businesses serving the Bay Area region and tourists. The loss of a direct freeway connection between I-80 and these neighborhoods is considered by some to be a contributing factor in this economic downturn. While the increased travel time to Chinatown and North Beach doubtless affected businesses in those areas, the recession, which some analysts find signs of beginning up to six months prior to the earthquake, ultimately overshadowed the effects of the earthquake for most businesses.

From the time the FEIR was certified in June 1987 to the present, however, employment at the project site has remained relatively stable. The Colombo Building, which has a mix of neighborhood-serving, ground-floor retail uses and second-floor offices typical of the Chinatown area, has maintained employment levels of about 40 during this period.¹

Office Vacancy Rates and Commercial Rents

The FEIR reported that a 1984 citywide survey of 315 office buildings showed a citywide vacancy rate of about 6.8 percent; a 1985 survey placed the Downtown office vacancy rate at approximately 12.4 percent.

On January 1, 1996, the San Francisco commercial real estate firm Stubbs, Collenette and Associates, Inc., issued *Office Space Survey, San Francisco Central Business District*, a report that surveys the current commercial office market in Downtown San Francisco.² This report surveyed 47,284,152 sq.ft. of office space, and found that the overall vacancy rate in the North of Market (NOM) area, which is roughly equivalent to the Financial District, was 8.2 percent (7.3 percent for Class A space, 9.5 percent for Class B space, and 11.2 percent for Class C space). This compares to an overall rate of about 9.18 percent for all classes of office space in the NOM and South of Market (SOM) areas combined.

The report states that California's real estate markets went into a recession well behind those of other major cities in the country, and are emerging from the recession later than the other markets. The report notes that there is a familiar pattern of recovery that has already occurred in cities such as Boston, Washington, Atlanta, Seattle, Denver, and mid-town Manhattan, which may foretell mid-term trends in San Francisco's office market. In all of these cities, vacancies for CBD office space have fallen, rents have risen, and capitalization rates have dropped. In most cases, new construction has not yet been justified, indicating that there will be a lag time of several years before new office space is delivered. Consequently, the market is set to tighten, both in terms of effective lease rates and in the capital value of office buildings.

The report also finds that construction has recently commenced on speculative office development in the Mid-Peninsula and East Bay office markets. Rents have risen to levels which have justified new construction, indicating that most of the surplus space created during the 1980s has been absorbed in those areas of the Bay region. This suggests that a San Francisco office tenant looking for suburban alternatives will not have the wealth of options that were available two to three years ago.

The 1987 FEIR found that as a result of demand and increasing operating costs in San Francisco, land prices, construction costs and interest rates, monthly rents for Financial District office space more than tripled in a decade, from \$8.50 per sq.ft. in 1970 to approximately \$30 per sq.ft. in 1981. As part of the 1996 Stubbs, Collenette and Associates, Inc. report cited above, a survey was completed of sample Class A and Class B buildings to determine trends in commercial office rents. The survey revealed that effective rents for view-space in "trophy quality" Class A buildings have risen between 10 percent and 20 percent since early 1993, depending on the building and location. This has been accomplished by a combination of higher contract rents, and a lessening of free rent, moving allowances and other inducements. As an example, specific leases were tracked at One Market Plaza, a Class A (trophy) building of 1.3 million sq.ft.; between January 1993 and December 1995, effective five-year rents rose from about \$25 per sq.ft. to about \$30 per sq.ft. Thus, some rates have returned to the levels found in the early 1980s. In non-Class A space, and in all categories of Class B space, no discernable increases in rents have been shown, except for small spaces under 2,000 sq.ft. As vacancy rates continue to fall, however, and leasing activity in these buildings increases, it is expected that increased rents will follow later in 1996.

HOUSING

San Francisco provides approximately 13 percent of the Bay Area's housing. The *San Francisco General Plan* establishes two priority policies of particular relevance to the proposed project: 1) that the city's supply of affordable housing be preserved and enhanced; and 2) that existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

Housing Conditions and Needs in Chinatown

The housing conditions in Chinatown today are not substantially different than those described in the FEIR (pages 66 to 68): Chinatown has experienced steadily worsening housing problems; the community's housing stock has deteriorated due to age, deferred maintenance, and overcrowding; and the population of Chinatown is older, poorer, less educated and more poorly housed than that in most of San Francisco.

Several recent studies give statistical as well as anecdotal evidence of the need for affordable, senior housing in San Francisco, particularly in the Chinatown area.³ There are approximately 138,000 persons age 60 or older living in San Francisco, approximately 19 percent of the total population. Between 1980 and 1990, the percentage increase of San Francisco residents over 60 years of age was negligible; there was, however, a noticeable increase in the percentage of persons 75 and older, and persons 85 and older. In Chinatown, between 1980 and 1990, the percentage of seniors 65 years of age and older increased from about 24 percent to 27 percent.

As the proportion of the elderly population in the higher age brackets increases, health problems increase, mobility decreases, and there is a corresponding change in the types of housing needed. The housing needs of elderly residents are compounded by poverty conditions, which also disproportionately affect Chinatown's elderly population.

High rents and low income levels are common for many elderly residents in San Francisco, suggesting a substantial demand for affordable and/or subsidized housing. Waiting lists for affordable senior housing units also indicate a high level of demand. In 1993, the Mayor's Senior Services Plan Task Force reported that applicants for senior/disabled units wait from two to four years prior to receiving assistance. A Catholic Charities survey in 1993 of 23 elderly facilities (other than public housing) revealed an average waiting period of 3.3 years for access to such

units. The San Francisco Housing Authority (SFHA) has a current (1996) waiting list of about 15,500, of which approximately 40 percent are senior/disabled. Current occupancy levels in existing SFHA dwellings is 98 percent overall, and 99 percent for senior/disabled units. With virtually a zero turnover rate, the SFHA can accommodate persons on its waiting list only by new construction.⁴

NOTES - Employment and Housing

¹ Willem Fleurbaaij, Pan Magna Group, Project Sponsor, telephone conversation, July 19, 1996.

² A copy of this report is on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

³ *Comprehensive Housing Affordability Strategy*, City and County of San Francisco; Area Plan 1993-1997, San Francisco Commission on the Aging; the Mayor's Senior Services Plan Task Force, November 5, 1993; and *Survey of Elderly Housing Facilities in San Francisco*, by Catholic Charities, 1993. Copies of these reports are on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

⁴ Mr. Ron Soneshine, Public Information Officer, San Francisco Housing Authority, telephone interview, July 1, 1996.

H. HAZARDS¹

As noted on page 57 of the FEIR, this city block has a history of developed uses for more than one hundred and fifty years. Many of the historic uses at these properties are associated with the presence of hazardous materials, either in the building materials,² in the fill materials underlying the site, or due to the specific land use activities at the site.

Historic records indicate that the first structures on the project site were built in the early 1840s. All of the original structures on the project site were destroyed during the earthquake and fire of 1906. Subsurface investigations have shown that the site is currently underlain by a layer of fill material, including fill that contains debris from the 1906 earthquake and fire. The fill layer ranges in thickness from approximately two feet to seven feet. Underlying the fill, sand and clay mixtures were generally encountered to a total depth of approximately 80 feet below ground surface. The depth to groundwater at the site ranges from ground surface to a depth of approximately four feet.

Due to the historic land uses on the project site, the firm of Treadwell & Rollo, Inc., a geotechnical and environmental consulting firm, under contract to the project sponsor, conducted hazardous materials site assessments and investigations at the project site. The objectives of these studies were: (1) to evaluate the potential for hazardous materials to be

present in the soil at the project site, (2) to identify and to characterize the nature and extent of hazardous wastes, and (3) to develop remediation strategies to mitigate public health hazards in accordance with regulatory requirements.

The Preliminary Environmental Assessment prepared in April 1994 by Treadwell & Rollo presents the results of the Phase I site assessment. The Phase I assessment includes a summary of the existing and previous site uses at the project site, based on research of Federal, State and local government agencies' files, review of historic aerial photos, historic fire insurance maps, and site reconnaissance. The Phase II subsurface assessment prepared for Site A in January 1996 consists of site testing, including soil borings, soil sampling and chemical analyses for the presence of hazardous materials and wastes.

NOTES - Hazards

¹ The information in this section is based largely on two background technical reports prepared by Treadwell & Rollo, Inc., Consulting Engineers and Scientists, for this project: *Preliminary Environmental Site Assessment, IIs Lane Development, San Francisco, California*, April 4, 1995, and *Soil and Groundwater Quality Assessment, Kearny and Jackson Street Site, San Francisco, California*, January 26, 1996. Copies of both reports are on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

² Hazardous materials are substances with certain chemical and physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, stored, disposed or otherwise managed. A substance is hazardous if it exhibits characteristics of ignitability, corrosivity, reactivity, or toxicity (*California Code of Regulations*, Title 22, Section 66261.20). The term "hazardous materials" is a broad term that includes waste products, substances, and usable products. In general, discarded or inherently waste-like hazardous materials are referred to as hazardous wastes. The term "hazardous substances" is sometime used interchangeably with "hazardous materials" but is commonly associated with federal regulations, which use that term, and in that connotation excludes petroleum products.

IV. ENVIRONMENTAL IMPACTS

The Final EIR (FEIR) references an Initial Study which determined that the following issues required no further environmental analysis: noise, construction air quality, energy, utilities and public services, biology, geology/topography, and water. These issues also do not require discussion in this document, as no new information on these topics has come to light and the proposed project changes do not cause new potentially significant environmental impacts in any of these areas. Mitigation measures from the Initial Study that remain relevant, such as for construction air quality, are included in Chapter V, Mitigation Measures, of this Supplemental EIR (SEIR) (Chapter V, pages 106 to 113).

This chapter discusses the same environmental areas as the FEIR and provides analysis of potential impacts related to the revised proposed project. Since the uses of the proposed project have changed to include more housing and no office, some of the environmental areas would be affected in different degrees than the project proposed in the FEIR. The impact analyses of land use and zoning, urban design, shadows and wind, and historic, architectural and cultural resources would be similar to the FEIR. Project-related transportation, air quality, economic conditions and hazardous wastes are substantially different than the conditions described in the 1987 FEIR, and the analyses of the project's potential effects in this SEIR on these areas would be correspondingly different. As was the case in the FEIR, some impacts presented in this section are not physical environmental effects as defined by the California Environmental Quality Act; however, they are included in this SEIR for informational purposes.

A. LAND USE AND ZONING

LAND USE

The Land Use and Zoning impacts section of the FEIR (pages 77 to 80) stated that the project proposed at that time would intensify office and retail space, extending the increased scale of these Financial District uses across Washington Street. It stated that the historic uses on the

sites would not be changed, but that the project would affect the scale and character of the surrounding neighborhoods (except for the Financial District), including Chinatown and North Beach. Potential changes resulting from that project which were identified in the FEIR included increased on-site employment, increased pedestrian activity, and increased pressure for conversion of nearby uses from lower-income-producing uses to higher-income-producing uses. The currently proposed project would not include commercial office space, and its retail space would be substantially less than earlier proposed. Therefore, those descriptions of the potential land use impacts of the previous project would not apply to the current proposal.

The currently proposed project would create a mixed-use development at Site A and Site B, consisting of 104 affordable residential units for seniors, up to 70 market-rate residential units, an elementary school, a Chinese language and cultural school, a religious pastoral and social center, 9,900 sq.ft. of neighborhood-serving retail space, and approximately 241 off-street parking spaces (156 self-park at Site A and 85 valet spaces at Site B).

The St. Mary's Chinese Catholic Center would introduce new land uses (institutional and religious) to the project area, however, these uses would be oriented to the needs of the Chinatown community and would be compatible with other land uses in the surrounding area.

The proposed uses on Site B would provide housing opportunities for workers in the Financial District, not unlike the Washington/Montgomery Tower located at 555 Montgomery Street, directly across Washington Street from Site B. This would also be considered a compatible land use. The combined development would increase pedestrian activity in the vicinity, due to the increased on-site population and the activities proposed.

ZONING

The FEIR (pages 78 to 80) described the zoning controls that pertain to Site A and Site B, and while the height and bulk of proposed structures has changed, all of the discussion with respect to controls and required exceptions is still accurate. Site A of the proposed project would require Conditional Use (CU) authorization to exceed 35 ft. in height adjacent to the Kearny Street sidewalk (Section 254, which calls for sunlight access); Sites A and B require CU authorization for new buildings exceeding 35 ft. in height in the Chinatown Mixed Use Districts (Section 254); and Sites A and B require CU authorizations for new buildings with heights above 65 ft. in a 65-D-2 Height and Bulk District (Section 263.1). The proposed project would also

require a modification of rear yard/lot coverage requirements (Section 134.1); exception from bulk requirements (in accordance with Section 271); exceptions to exceed a 5,000 sq.ft. lot size (Section 121.3); to potentially exceed the 5,000 sq.ft. per commercial size limit on Site B (Section 121.4); to exceed a street frontage of 50 linear feet (Section 145.3); exceptions from the loading dock requirement (Section 152, Table 152) and the open space requirement (Section 135.1); deviation from parking requirement (Sections 154, 155(j), 161 and 209); and an exception to permit provision of a parking garage in the CR/NC (Sections 812 and 890.11).

The basic Floor Area Ratio (FAR) for the CR/NC District is 1.0:1; the FAR for the CCB District is 2.8:1. These FAR limits would not apply to the proposed project, in accordance with Section 124.(a)&(b), which exempt residential and institutional (school and chapel) uses. The underlying FAR of 10:1 would apply to garage and commercial uses.

Under the permanent controls which govern the residential density allowable on Site A and Site B, the permitted dwelling unit density is one for each 200 sq.ft. of lot area (Section 207.5). The Code further provides, under Section 209.1(m), that dwellings specifically designed for, or occupied by senior citizens or physically handicapped persons may be allowed at a density not exceeding twice the number of units otherwise permitted. The 104 units proposed at Site A would be fewer than the 188 units permitted. The 70 units proposed for Site B are the maximum allowed by the Code.

The FEIR (pages 79 and 80) described the zoning controls that pertain to Site A and Site B concerning the type and amount of required and permitted off-street parking. An analysis of the currently proposed parking plan and its relationship to the Code is provided in Chapter IV.E, Transportation.

B. URBAN DESIGN AND SITE VISIBILITY

URBAN DESIGN

The analysis of urban design impacts on pages 80 and 81 of the FEIR is applicable to the potential effects of the proposed project. The project would alter the scale, facade rhythm, and urban texture of the project block and its vicinity. The project would represent a departure in form and scale from existing development on the project block and it would be similar to newer highrise and mid-rise structures located mainly south of the block. The Urban Design Element objectives and policies discussed in Table 3 (pages 82 through 84) in the FEIR are still applicable to the proposed project. The relationship of the project to the policies would still be the same.

SITE VISIBILITY

As noted on page 81 of the FEIR, in some short- and mid-range views, the two proposed structures would alter the small-scale character of the area (see Figures 18 through 21, pages 68 to 71, for photomontages of the current proposal). The project would be visible from medium- and long-range view points to the north and west. From Telegraph Hill and Nob Hill, the project would be visible as part of a group of existing structures of the downtown Financial District. Occupants at lower levels of adjacent buildings may have some views blocked; however, these are private views rather than public panoramic vistas, which are not affected by the project.

Under *City Planning Code* Section 263.1, the proposed project would be allowed to exceed the 65-foot height limit up to 200 feet; however, the City Planning Commission would consider the project with respect to the following criteria: siting of the buildings so as to produce a stepping down of the height from the downtown Financial District to the Jackson Square Area; the avoidance of excessive bulk, intrusiveness or continuous wall of buildings that would adversely affect views, penetration of sunlight or pedestrian amenity; and respect for the historic and architectural character and special scale of Jackson Street. The project would represent a stepping down from the Downtown District, from the 30-story towers on the south side of Washington Street to the 6- and 7-story buildings on the north side of Jackson Street. Public scenic views or vistas would not be obstructed and the project would not cast new shadows on Portsmouth Square (see section C. Shadow and Wind below).

C. SHADOW AND WIND

SHADOW

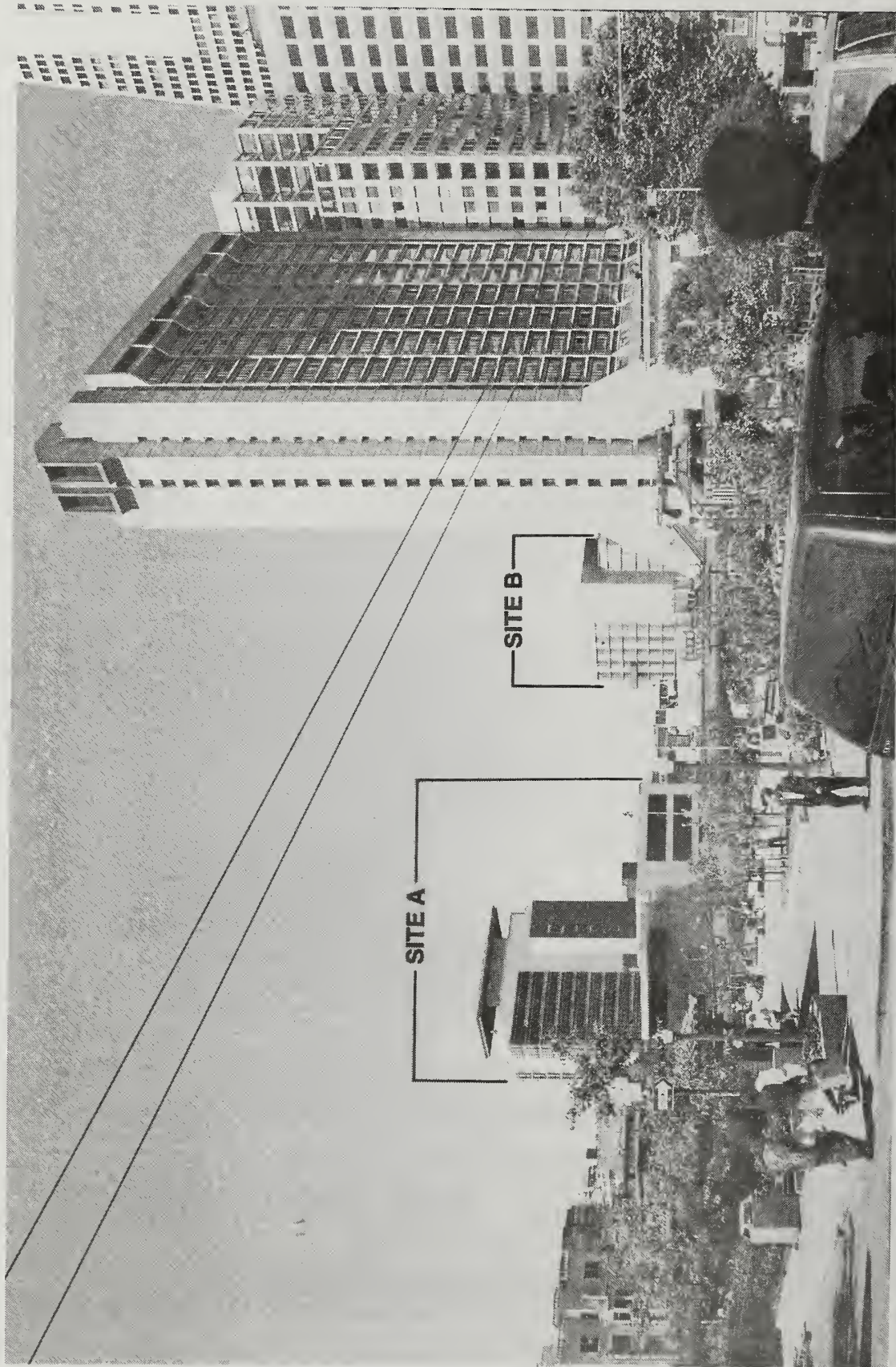
A new shadow analysis was conducted for the proposed project for all four seasons of the year (March, June, September and December) at 10:00 a.m., noon and 3:00 p.m., to determine the range of project shadow impacts, which are slightly different than the project analyzed in the FEIR on pages 81, 92 and 93. Surrounding highrises, such as the Transamerica Pyramid and the Holiday Inn Hotel, currently cast substantial shadow in the project vicinity.

In March at about 10:00 a.m. (see Figure 22, page 72), the project would cast new shadow on the intersection of Kearny and Jackson Streets and along the street frontages of Site A. The building on Site B would cast new shadow on a rooftop and a small portion of IIs Lane in the interior of the project block. By noon, the shadows would have shortened, shadows from the



Source: Square One Productions

**PHOTOMONTAGE OF SITES A AND B FROM COLUMBUS/KEARNY • FIGURE 18
(REVISED)**



PHOTOMONTAGE FROM SOUTHWEST CORNER OF PORTSMOUTH SQUARE • FIGURE 19
AT CLAY STREET AND WALTER II IIM PLACE (REVISED)

Source: Square One Productions



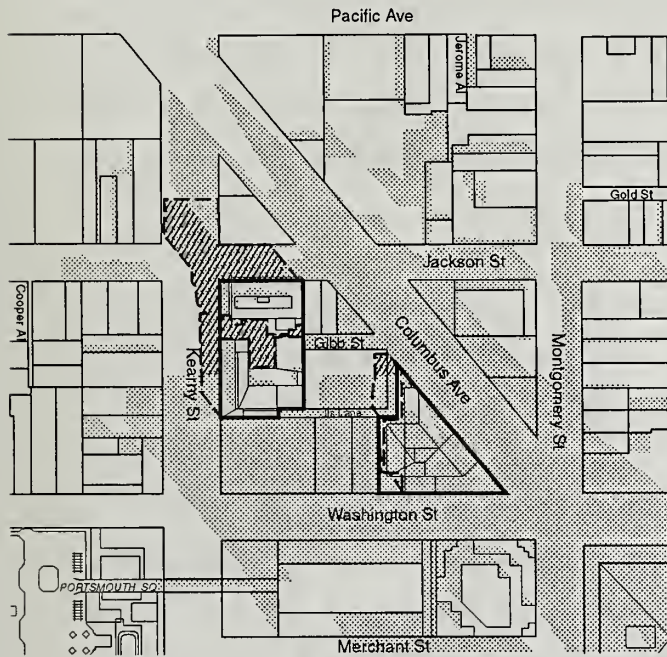
Source: Square One Productions

**PHOTOMONTAGE OF SITE B FROM WEST OF KEARNY / WASHINGTON ● FIGURE 20
(REVISED)**

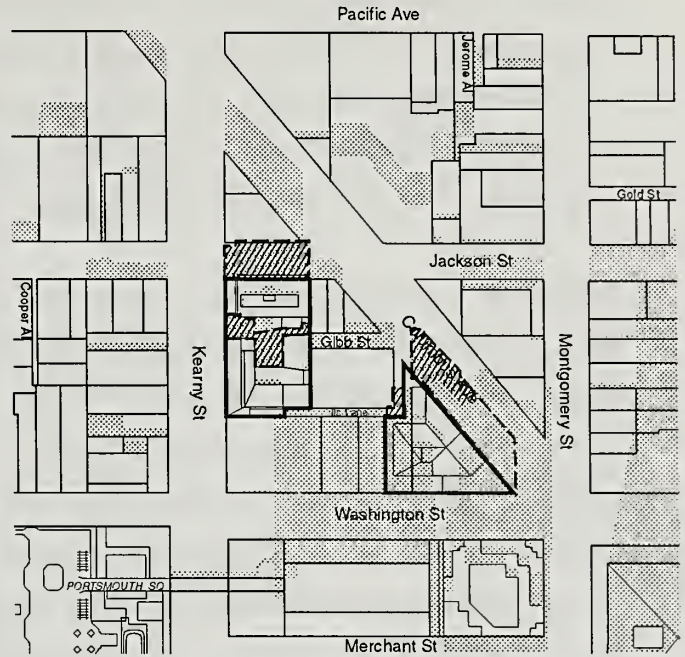


Source: Square One Productions

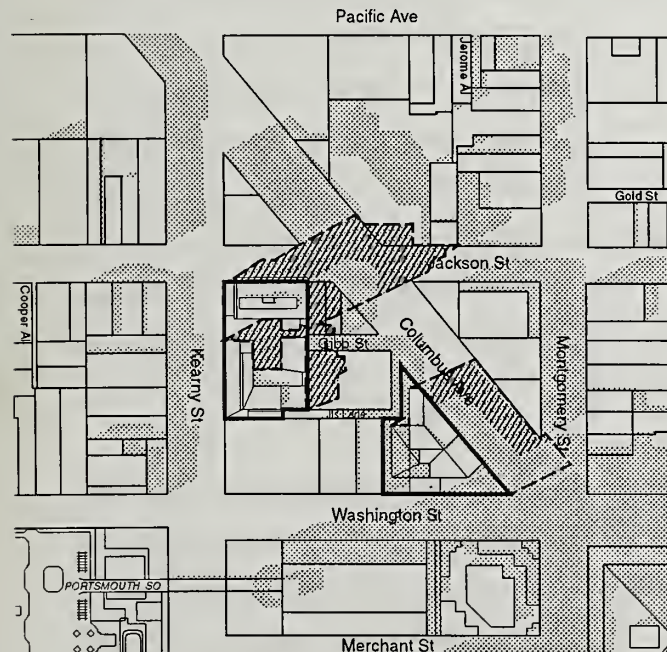
**PHOTOMONTAGE FROM NOB HILL ●FIGURE 21
(REVISED)**



10:00 AM PDT





12:00 NOON PDT



3:00 PM PDT

LEGEND

- Project Shadow
-  Shadow from existing building
-  Net new shadow from project



Source: During Associates and ESA

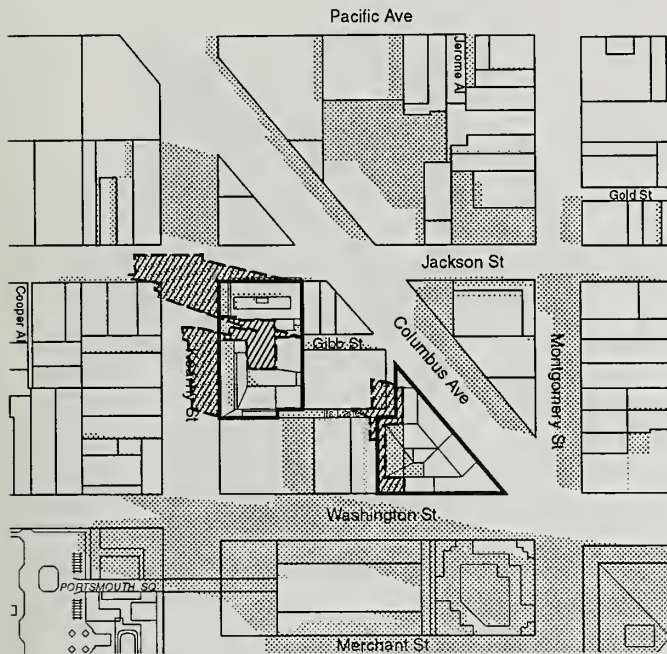
PROJECT SHADOW PATTERNS—MARCH 21 ● FIGURE 22 (REVISED)

Site A building would cover the south side of the 900 Kearny Building, extending north across Jackson Street. Shadows from the building on Site B would extend northeast including new shadow mainly on Columbus Avenue and a portion of IIs Lane. At 3:00 p.m., shadow from Site A would extend northeastward as far as the east side of Columbus Avenue, covering streets, sidewalks, the bus stop on Columbus and rooftops. Shadow from Site B would extend across Columbus to the old Transamerica building.

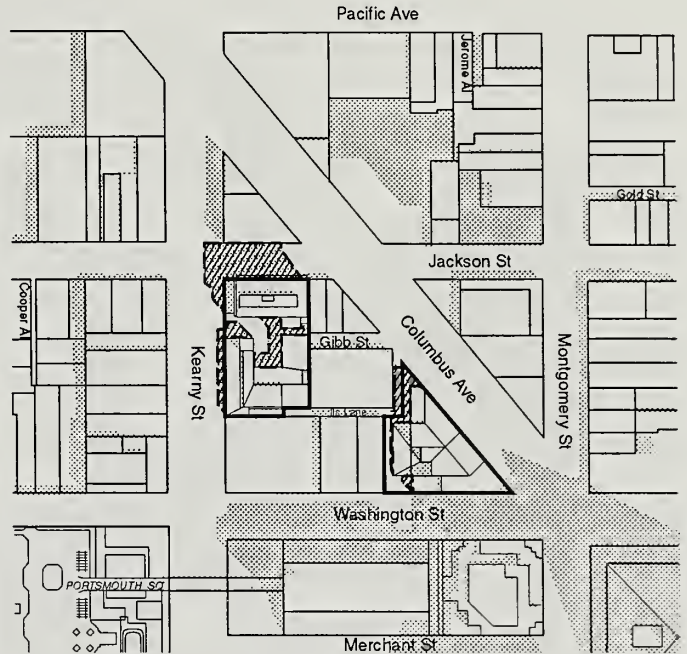
In June at 10:00 a.m. (see Figure 23, page 74), the building on Site A would cast shadows northwestward across Kearny Street; the building on Site B would cast shadow northwestward mainly onto rooftops and on IIs Lane in the interior of the project block. By noon, project shadows would have shortened somewhat: Site A would shade portions of streets and sidewalks north and west of the site; Site B would shade portions of IIs Lane. At 3:00 p.m., the structure on Site A would shade the southern sidewalk of Jackson Street west of Columbus Avenue and sidewalks on Columbus and Jackson, east of the intersection, and the restaurant at the southeast corner of the Columbus and Jackson intersection; Site B would add new shadow across Columbus Avenue and on Montgomery Street.

In September at 10:00 a.m. (see Figure 24, page 75), the Transamerica Pyramid and the Holiday Inn cast shadow across both project sites; the proposed structure on Site A would add new shadow to portions of Kearny and Jackson Streets. The building on Site B would cast no new shadow at 10:00 a.m. At noon, the building on Site A would cast new shadow extending westward on Kearny Street and past Jackson Street to the next block; the building on Site B would shade a portion of Columbus Avenue and IIs Lane. At 3:00 p.m., the building on Site A would cast shadow northeastward, across Columbus Avenue, shading streets and sidewalks and the rooftops on the project block. The structure on Site B would cast some new shadow on Columbus Avenue as far as the old Transamerica building.

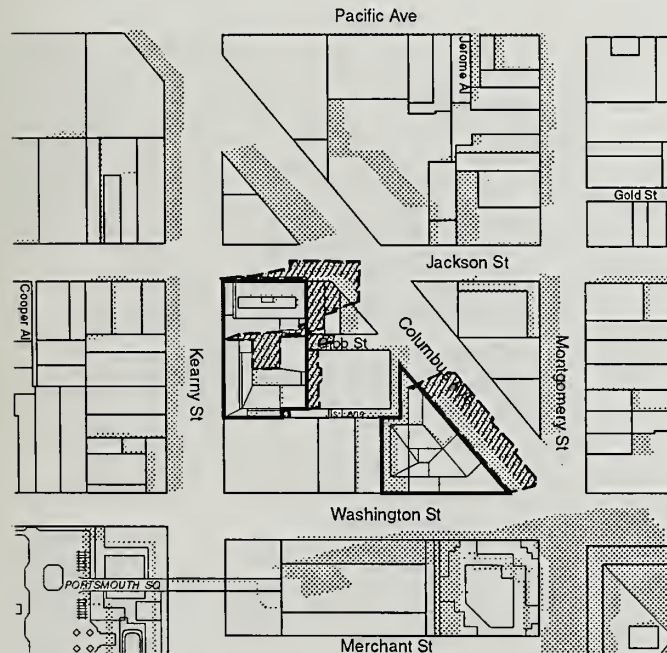
In December at 10:00 a.m. (see Figure 25, page 76), the Montgomery/Washington building and the Holiday Inn shade both project sites; the proposed tower on site would add new shadow on portions of the 900 Kearny Street Building. At noon, the structure on Site A would cast new shadow northward across Jackson Street and the interior courtyard; new shadow from Site B would be on a portion of IIs Lane and on a small strip on Columbus Avenue. At 3:00 p.m., the structure on Site A would cast shadow northeastward on the interior courtyard of the project and new shadow on rooftops and sidewalks on Jackson Street and Columbus Avenue; Site B would cast new shadow on a portion of the old Transamerica building.



10:00 AM PDT



12:00 NOON PDT



3:00 PM PDT

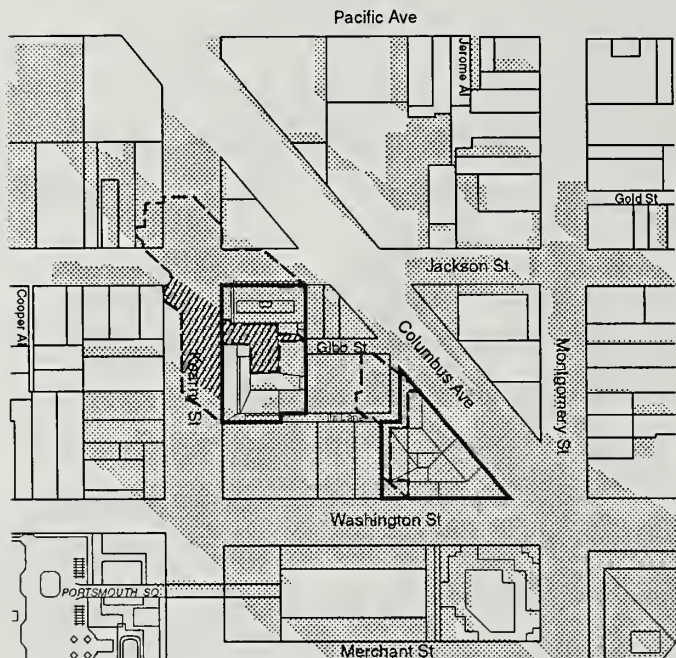
LEGEND

- Project Shadow
- Shadow from existing building
- ▨ Net new shadow from project

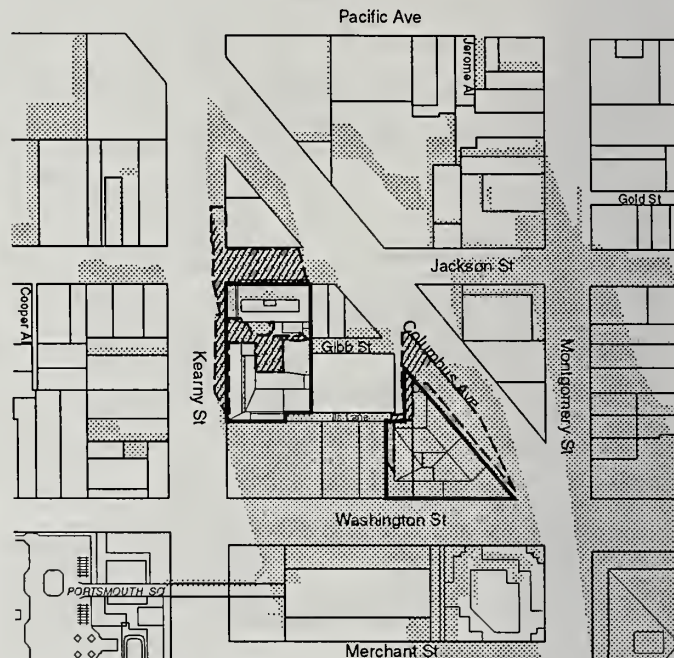


Source: During Associates and ESA

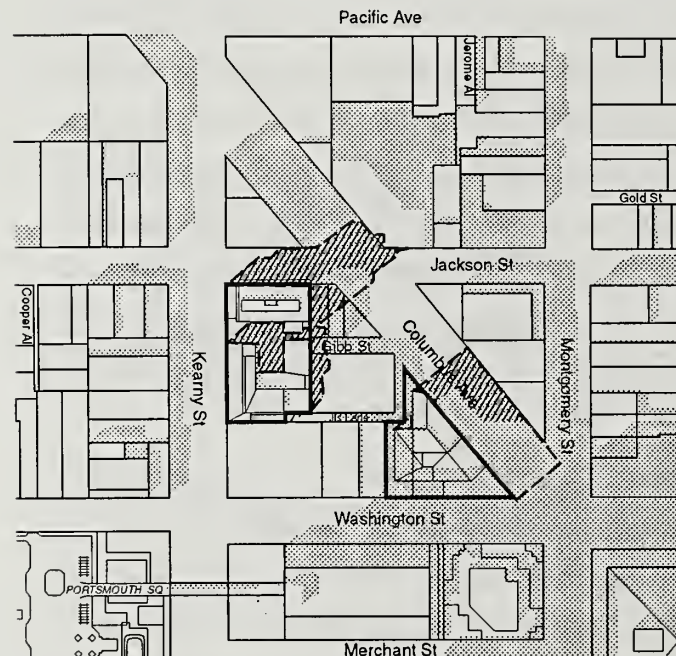
PROJECT SHADOW PATTERNS—JUNE 21 ● FIGURE 23 (REVISED)



10:00 AM PDT



12:00 NOON PDT



3:00 PM PDT

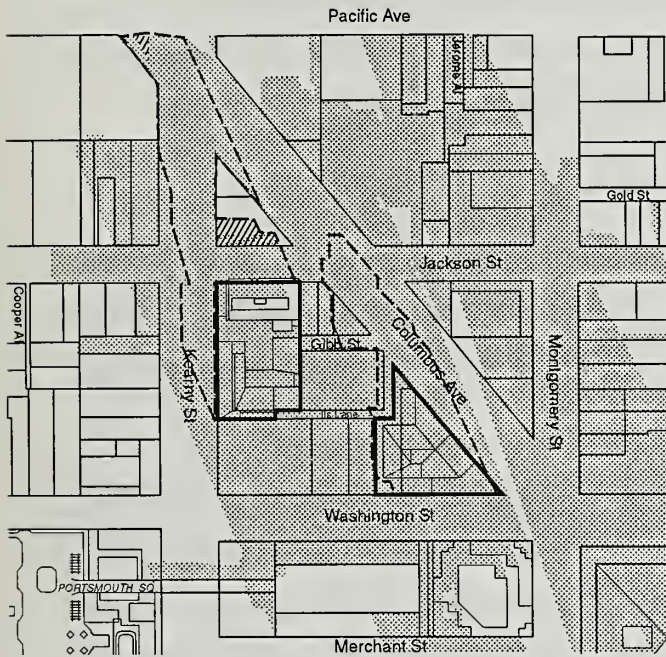
LEGEND

- Project Shadow
- Shadow from existing building
- ▨ Net new shadow from project

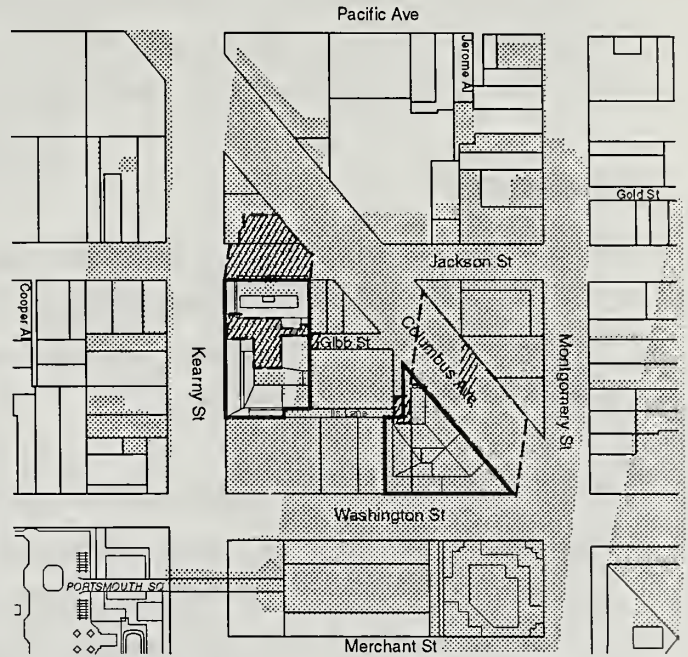


Source: During Associates and ESA

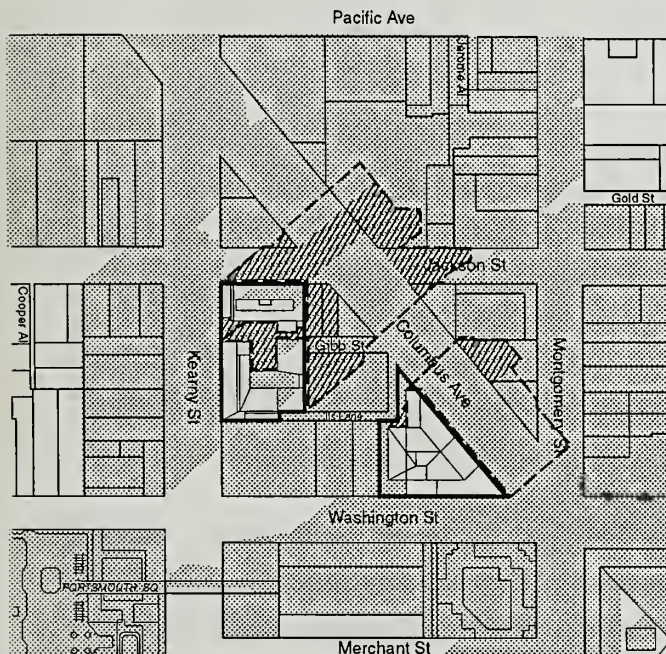
PROJECT SHADOW PATTERNS—SEPTEMBER 21 ●FIGURE 24 (REVISED)



10:00 AM PDT





12:00 NOON PDT



3:00 PM PDT

LEGEND

- Project Shadow
-  Shadow from existing building
-  Net new shadow from project



Source: During Associates and ESA

PROJECT SHADOW PATTERNS—DECEMBER 21 ●FIGURE 25 (REVISED)

The interior courtyard for Site A would be in shadow during the times and months analyzed above, either from shadows cast by existing buildings or from the proposed Catholic Center and School surrounding the courtyard on the west, south, and east sides. At 3:00 p.m. on March 21, a portion of the entry to the courtyard would not be in shadow.

Proposition K

On June 5, 1984, Proposition K, the Shadow Ban Initiative Ordinance, was passed by the voters. Generally, Proposition K prohibits issuance of a building permit for structures that will cast any significant shadow upon property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Department.

The only property under jurisdiction of (or designated for acquisition by) the Recreation and Park Department which the project could possibly shade is Portsmouth Square, located one-half block southwest of the site. Figure 26 (page 78) shows the maximum extent of project shadow towards Portsmouth Square. The project would add no new shadow to Portsmouth Square from one hour after sunrise to one hour before sunset year round.

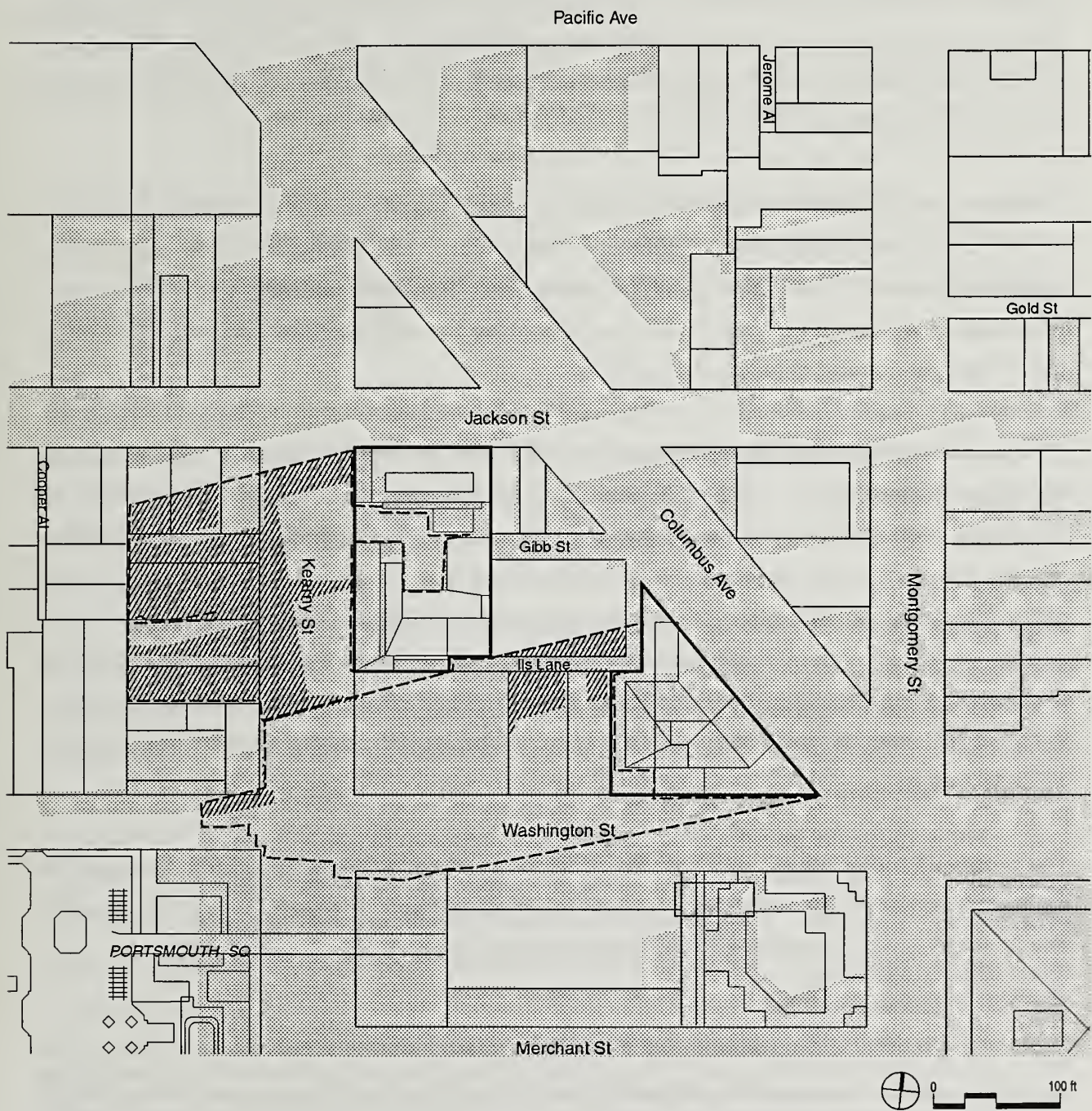
The Sky Plane Analysis, described on page 98 and shown in Figure 33 on page 99 of the FEIR, is no longer accurate and is not replicated in this SEIR.

WIND¹

The wind tunnel study, described on pages 98 to 100 in the FEIR, is no longer valid due to the change in existing wind conditions, the different massing of the proposed project compared to the project in the FEIR, and the present technology that can now determine the presence of potential wind speed exceeding the hazard criterion of 26 m.p.h. for more than a single hour of any year. Subsequent wind tunnel studies were conducted for the proposed project and the results are summarized in this section.

For the proposed project, wind tunnel measurements were made at 13 of the 21 surface locations in the FEIR near the project site for each of the prevailing wind directions (northwest, west-northwest, west and west-southwest) using a scale model of the site, the project and vicinity.² The studies included separate tests of northwest, west-northwest and west winds under existing conditions and with the proposed project in place.

As with the study in the FEIR, wind test data were combined with wind records to predict the wind's speeds that would be exceeded 10 percent of the time at each test location. The



LEGEND

----- Project Shadow



Shadow from existing building



Net new shadow from project

Source: During Associates and ESA

CLOSEST APPROACH OF PROJECT SHADOW TO PORTSMOUTH SQUARE FIGURE 26 DURING THE HOURS OF PROPOSITION K

predicted winds were then compared to the comfort and hazard criteria in the *City Planning Code* (Section 148; although this portion of the Code is for C-3 districts, it is adjacent to the project site and, therefore, provides relevant criteria against which to evaluate the proposal). Throughout the following analysis, the wind speeds reported refer to the equivalent wind speeds that would be exceeded 10 percent of the time.³

The measured equivalent wind speed for existing winds in the project vicinity range from 6 m.p.h. to 17 m.p.h. (see Appendix B, Figure B-1, page A.5). The strongest winds occur along Columbus Avenue at the Washington and Montgomery Streets intersection, where none of the wind speeds is less than 11 m.p.h. Winds at four of the 13 measured locations currently exceed the pedestrian comfort criterion of 11 m.p.h.

The project would result in winds that range from 5 m.p.h. to 16 m.p.h. The project would cause winds to decrease at six of the 13 locations (primarily near the Montgomery/Washington/Columbus intersection and at the northwest corner of Site A). Winds would be unchanged at four locations and would be increased at three locations at the southwest and southeast corners of the Jackson/Columbus intersection (increases range from 3 to 6 m.p.h. for total increased wind speeds of 10, 13 and 14 m.p.h.) and at the northwest corner of the Washington/Columbus intersection (increases from 1 to 5 m.p.h. for total increased wind speeds of 13 and 16 m.p.h.). Winds at six locations would still violate the 11 m.p.h. pedestrian comfort criterion (ranging from 13 to 16 m.p.h.)

The proposed project would eliminate the hazardous wind condition that currently exists at the southwest corner of Columbus Avenue and Washington Street. The project would not result in any hazardous wind conditions in publicly accessible areas.

NOTES - Shadow and Wind

¹ This section is based on two studies entitled *Wind-Tunnel Test and Evaluation of Pedestrian Wind Effects of the Proposed Kearny/Columbus Project*, July 18, 1996, and *Revised Wind-Tunnel Test and Evaluation of Pedestrian Wind Effects of the Proposed Kearny/Columbus Project*, August 9, 1996, prepared by Dr. Bruce White and Chuck Bennett for Environmental Science Associates, Inc. These studies are on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

² The August 9, 1996 study only measured those locations judged to be most affected by a change in wind conditions under the revised building design.

³ Equivalent wind speed is an hourly wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians.

D. HISTORIC, ARCHITECTURAL AND CULTURAL RESOURCES

HISTORICAL AND ARCHITECTURAL RESOURCES¹

The proposed project would demolish the Colombo Building on Site B. As described in the Final EIR, the Colombo Building was rated "3" in the 1976 Department of City Planning Architectural Inventory, was rated "B*" (if alterations were removed, the building would be rated "A") by Heritage in their extended survey and was recommended for, but never received, Landmark Status. The Colombo Building has also been determined by the State Office of Historic Preservation to be potentially eligible for inclusion in the National Register of Historic Places (North Beach Survey, June 1982).

Demolition of the Colombo Building would mean the loss of an historic structure in downtown San Francisco. The introduction of a ten-story building on Site B would affect the sense of historic balance between the Colombo Building and the Landmark-designated Transamerica building that form a distinctive gateway to Columbus Avenue.

The proposed project would include a 15-story tower on Site A. This tower would partially block some private views from the lower levels in buildings adjacent to the project of low-rise development comprising the nearby Jackson Square Historic District and the potential Chinatown Historic District. No public vistas would be blocked by the project. In the opinion of the historic preservation consultant, however, the tower on Site A would represent a transition in height from the Columbus Tower Building at Kearny and Columbus to the Holiday Inn south of the project and the higher office buildings in the downtown area. The tower would also be a mediating structure between the Jackson Square District with the 17-story Appraiser's Building (630 Sansome Street) on the east side of the District and the Chinatown area sloping upward to the west of the project.

Several objectives and policies contained in the Urban Design Element of the San Francisco General Plan apply to the project, including: Objective 2, Policy 4, "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development," and Objective 2, Policy 6, "Respect the character of older development nearby in the design of new buildings."

CULTURAL RESOURCES

The archaeological resources report, *Cultural Resources Evaluations: Pan Magna Plaza Development Project, San Francisco, California*, was prepared for the proposed site by Allen S. Pastron, Ph.D., consulting archaeologist for the FEIR. Subsequent to the FEIR, two more reports were prepared: *Cultural Resources Evaluation: Pan Magna Development Project, San Francisco, California*, June 1995, and *Archaeological Data Recovery Program Conducted Within Site A of the Kearny/Columbus Site, San Francisco, California*, February 1996. Copies of these reports are on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

The investigation indicates the potential presence of significant cultural resources on both Sites A and B, dating from the Spanish-Mexican, Early American, and Gold Rush periods. There is also evidence that Native American remains and cultural remains from more recent periods may be discovered.

The proposed project would involve excavation one level below the existing basement level on Site B; on Site A, the project would involve excavation about 42 feet below the existing basement (which is approximately 10 feet below grade). Excavation for the proposed project would intrude upon any artifacts and might damage the resource irretrievably. Mitigation measures are listed on pages 107 to 109 that address the potential impact on archaeological resources.

NOTES - Historic, Architectural and Cultural Resources

¹ *Kearny Street/Columbus Avenue Project, Historic Resources Study*, Page & Turnbull, Inc., August 1996.

E. TRANSPORTATION

CUMULATIVE CONTEXT

Introduction

Prior to the 1989 Loma Prieta earthquake and the recession of the early 1990s, the cumulative context for future transportation conditions in San Francisco and the Bay Area was based on future year 2000 and 2010 analyses presented in the *Mission Bay EIR* and the *South of Market*

EIR. These estimations of future conditions have been superseded with the recently completed analysis conducted for the *Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure DEIS/DEIR*.¹ The analyses conducted as part of these recent studies incorporate the changes to the regional and local street network following the Loma Prieta earthquake, and updated estimates of economic growth and change in San Francisco and the Bay Area prepared by the Association of Bay Area Governments (ABAG).

Overall, the results of the Embarcadero/TSS Replacement analyses are consistent with previous studies, in that in the future, more congested highways combined with improvements in transit would result in a shift from autos (especially solo drivers) to transit and ridesharing for trips to and from the downtown and vicinity, which includes the Kearny/Columbus project site. The relevant transportation analysis from the *Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure DEIS/DEIR* is incorporated by reference and summarized below.

Future San Francisco Travel Demand

The *Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure EIS/EIR* analysis includes evaluation of transportation conditions in the year 2015. Future travel demand was estimated using the regional travel demand forecasting model developed by the Metropolitan Transportation Commission (MTC). This model utilizes the Association of Bay Area Governments (ABAG) land use database in the nine county San Francisco Bay Region to determine the number of future daily and peak period trips. As part of the environmental review process, the City and County of San Francisco Planning Department developed year 2015 estimates of the number of households and employees at the Traffic Analysis Zone level, based on citywide ABAG projections for year 2010, information on approved projects in downtown, and reasonable assumptions regarding future development.

ABAG '92 projections for the year 2010 were adjusted for downtown San Francisco zones in Superdistricts 1 (northeast quadrant) and 3 (southeast quadrant), and extrapolated to develop year 2015 conditions. In total, employment in San Francisco is expected to increase between 1990 and 2015 by 165,631 jobs (28% increase), and the number of households is expected to increase by 45,572 dwelling units (15% increase). Superdistrict 1, which includes the Financial District as well as the proposed project site, is anticipated to experience the greatest growth of

the four Superdistricts that comprise San Francisco. Employment is anticipated to increase by 128,292 jobs (32% increase), and households by 39,449 dwelling units (68% increase).

A market study conducted for the Planning Department following the development of year 2015 land use estimates by the Planning Department forecast lower estimates of employment than those summarized above. However, the total difference for those travel analysis zones in the downtown area between the preliminary and the revised estimates was less than four percent, and even lower (less than one percent) for the four San Francisco Superdistricts as a group. As a result, the Planning Department estimates were assumed to be valid and were used in the analysis.²

Daily travel demand estimates were developed using the updated year 2015 land use database and the transportation network included in the year 2010 MTC travel demand forecasting model. Between 1990 and 2015 it is anticipated that there would be an increase of 581,189 (15% increase) in total persons trips per day (auto plus transit) within San Francisco. Transit trips would increase by 22 percent, while auto trips would increase by 13 percent city-wide. The greatest increase for both auto and transit would be in Superdistrict 1, which includes the project site, and Superdistrict 3.

The proposed project is expected to be completed, occupied and the amount of net new space attributed to the project absorbed by 2005. Therefore, the impacts of the project and contribution to cumulative transportation impacts would occur within the 1993 to 2015 context.

Regional Travel

The October 1989 Loma Prieta earthquake rendered many freeway sections and freeway ramps serving San Francisco inoperable. The closure and/or demolition of freeways affected accessibility to and from San Francisco, particularly the northeast quadrant of the City, the area generally north of Bryant Street and east of Van Ness Avenue. The primary freeway facilities that provided access to the east side of San Francisco include the Embarcadero Freeway (SR 480) and I-280. Both were severely damaged as a result of the earthquake and had to be closed immediately following the earthquake. A brief summary of the status of each freeway follows:

Embarcadero Freeway: Prior to the earthquake the Embarcadero Freeway provided access to downtown San Francisco and the northeast waterfront via the Main/Beale, Washington/Clay and

Broadway ramps. The closure of the freeway following the 1989 earthquake gave the City an opportunity to evaluate its role in serving the downtown street network and the I-80/U.S. 101 connections in relation to its location on the Bay shoreline. As a result, in 1990, the San Francisco Board of Supervisors passed a resolution endorsing the demolition of the Embarcadero Freeway and calling for the evaluation of alternatives to an elevated structure. The demolition of the Embarcadero Freeway and associated ramps resulted in a reduction in congestion at the ramp locations, but affected local traffic by dispersing regional traffic onto local streets. In particular, the Clay/Washington ramps to the Embarcadero Freeway were demolished, changing traffic patterns in the project area.

A joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR) has been prepared by the City, Caltrans and the Federal Highway Administration to analyze potential impacts of the alternatives to the former elevated Embarcadero Freeway. That EIS/EIR was expanded in 1994 to also include effects of demolition of the Terminal Separator Structure ramps that led to/from the Embarcadero Freeway and various City streets. A Draft EIS/EIR was published in August 1995; public hearings were held during the fall. A Final EIS/EIR is in preparation.

Five project alternatives and several variants to those alternatives have been evaluated as part of the environmental review process. They include a "No Build" alternative and four "Build" alternatives. On January 29, 1996, the San Francisco Board of Supervisors selected one of the build alternatives (the DPT Variant of Alternative 5) as the preferred project alternative. The DPT Variant of Alternative 5 would realign and upgrade the existing surface roadway along The Embarcadero between Folsom Street and Broadway, providing three continuous traffic lanes in each direction during the AM and PM peak periods, with the curb lanes providing parking in off-peak periods. This alternative would modify the existing Fremont Street off-ramp from I-80 westbound to allow traffic direct access to Folsom Street. It would also provide additional off-ramp capacity from I-80 eastbound by widening the freeway's approach to the existing Fourth Street off-ramp. Following certification of the FEIR/EIS, the San Francisco Board of Supervisors will select a final alternative and request funding from the Federal Highway Administration.

I-280: The I-280 Freeway, which provides access between downtown San Francisco and the Peninsula and the southwestern areas of the City, was also damaged in the 1989 earthquake. The damage was not substantial enough to merit demolition, and Caltrans decided to seismically

upgrade the facility. Phase I of the retrofit effort, which consisted of substantial closures of the freeway and ramps, was completed in December 1995. The ongoing Phase II retrofit effort will not involve any lane closures during the peak periods, and is anticipated to be completed by the end of 1997.

The closure of I-280 resulted in an increase in traffic on I-80/U.S. 101 and on ramps serving downtown San Francisco. With the recent completion of the Phase I earthquake retrofit effort, I-280 has become available to Peninsula and southwest San Francisco traffic. The planned modifications to I-280 to realign the Berry Street off-ramp to touch down at King Street near 5th Street and construct a new corresponding on-ramp at King Street, combined with the reconstructed The Embarcadero, would serve to improve access to I-280 from downtown and the waterfront. These modifications are expected to be completed by the end of 1997.

Local Streets

Following the Loma Prieta earthquake and subsequent closure and/or demolition of regional facilities, traffic volumes on local streets generally increased, although some decreases occurred on some specific streets, primarily those serving as access routes to/from demolished ramps.

Between 1990 and 2015, daily auto trips in San Francisco are anticipated to increase by 13 percent, and are anticipated to increase by 9 percent in Superdistrict 1. This would result in an increase in the number of vehicles using the regional freeway facilities to access and travel through San Francisco, as well as vehicles traveling on local streets. The projected increase in overall trips in the City would result in an increase in traffic on local streets in the future, as new freeways are not proposed to replace those demolished.

The vehicular traffic associated with the proposed project would be part of the cumulative increase in traffic on the regional facilities and local street network; however, project traffic would not contribute substantially to the cumulative conditions. The project traffic represents less than one percent of the total growth in PM peak hour vehicular traffic between 1990 and 2015. The contribution of the project to the regional bridges and freeways would be minimal, as the majority of the trips (approximately 80 percent) would be from locations within San Francisco and would use local streets to access the project. The remaining 20 percent of the project vehicle trips would be from outside San Francisco and would primarily use I-80 to access the local streets, as most of these trips would come from the east and south bays. The proposed project would

also contribute to the cumulative traffic conditions on local streets, including Washington and Kearny Streets and Broadway. The project trips, however, would not substantially affect the cumulative conditions on these facilities.

The duration of the PM peak period during which regional and local facilities are operating at capacity is expected to increase in the future. This extension or "spreading" of the PM peak period is expected to occur due both to overall growth in traffic and to no substantial changes to the capacity of the regional and local roadway facilities. The proposed project traffic would result in an increase in the PM peak hour traffic volumes on regional and local facilities, and would therefore contribute to the expected spreading of the peak. However, the project would not be a substantial contributor to the PM peak spread.

Transit

Transit services in the year 2015 would be similar to those existing today, except that several planned transit projects are expected to be constructed by 2015. MUNI's planning objectives include meeting transit demand and accommodating future growth and transportation patterns, and it is anticipated that transit service will be adapted to meet the changing demands within the constraints of declining federal and state operating assistance. These objectives are consistent with the City's "Transit First" policy that indicates that the City has established transit as the preferred mode of transportation for satisfying growing travel demand.

Planned transit services to accommodate future demand include:

- MUNI Metro extension along The Embarcadero between Market Street and Third/King Street. The MUNI Metro turnback at the foot of Market Street is currently under construction. Tracks and stations south of Market Street to Fifth/King Streets have been completed.
- The F-Market electric streetcar extension from Upper Castro to Fisherman's Wharf via Market Street and The Embarcadero. The segment between Upper Castro and Fremont Street is currently in service, and the segment on The Embarcadero between Broadway and Fisherman's Wharf is under construction.
- BART Service on the Daly City line extended to the San Francisco International Airport, and decreased service headways from 3.75 minutes to 2.25 minutes. BART extensions to Pittsburg and Dublin in the East Bay are also assumed to be in place by 2015. The BART extensions to North Concord and Colma have recently been opened and those stations are in operation.

- CalTrain service extension to downtown San Francisco, and service level increases in the number of trains.

Other transit service providers in San Francisco (the Airporter, Amtrak feeder buses, Gray Line, Golden Gate Bridge Highway and Transportation District (GGBHTD), SamTrans, AC Transit and other private bus operators) are assumed to offer services similar to those provided today, with adjustments for duplication with planned projects noted above, and possible service increases in response to travel demand.

As identified in the Future Travel Demand discussion above, the number of persons using transit to access or leave San Francisco is expected to increase by approximately 22 percent between 1990 and 2015. This increase is greater than the increase in auto traffic and reflects the shift to transit due to increasing congestion in the Bay Area and improvements in transit services. The increase in the use of transit would be most substantial in Superdistrict 1 (25% increase) and Superdistrict 3 (39% increase).

The approximately 75 PM peak hour transit trips generated by the proposed project would be part of the overall increase in transit trips identified above for Superdistrict 1, and would primarily affect local MUNI transit lines rather than regional transit service.

PROJECT IMPACTS³

Travel Demand

The proposed project is anticipated to generate approximately 840 vehicle trips on a weekday, of which 100 would occur during the PM peak hour (between 4:30 and 5:30 p.m.). Although there would be many activities offered at the project site during weekdays (between 7:30 a.m. and 9:30 p.m.) and on weekends (between 9:00 a.m. and 7:00 p.m.), only those which would generate trips during the PM peak hour were considered in the project's transportation analysis. These activities would include a language class offered between 5:00 p.m. and 7:00 p.m. (inbound trips only), league basketball and volleyball games in the gym between 3:00 p.m. and 5:00 p.m. (outbound trips only), and youth gym activities between 6:00 p.m. and 9:00 p.m. (inbound trips only).

Project travel demand refers to the total new traffic a proposed project would generate. Table 2, page 89, presents the estimated weekday daily and PM peak hour *person* trip-ends (PTEs) that would be generated by employees, visitors, and residents of the proposed project (one PTE is a one-way trip; a visitor to the who arrives at and later leaves the project generates two PTEs). As the table indicates, the proposed project would generate a total of 4,485 weekday daily person-trips (2,300 for Site A and 2,185 for Site B), and 319 weekday PM peak hour person-trips (140 for Site A and 179 for Site B).

Table 3, page 90, presents the estimated weekday daily and PM peak hour *vehicle*-trip generation for employees, visitors, and residents of the proposed project. The vehicle-trip generation for the school component of Site A was based on data provided by the St. Mary's Day School and Catholic Center. Although the elderly housing component of Site A would generate mostly walk and transit trips, a 100 percent drive-alone mode split was assumed for the PM peak hour, in order to conduct a "worst-case" conservative traffic analysis. As shown in the table, the proposed project would generate a total of 842 total daily vehicle trips (405 for Site A and 317 for Site B), of which 101 vehicle trips (74 for Site A and 27 for Site B) would occur during the weekday PM peak hour.

Table 4, page 91, shows the trip distribution pattern for the proposed project by land use type. The table indicates that approximately 79 percent of the school trips and 38 percent of the retail trips destined to Superdistrict 1 travel from within San Francisco. Approximately 93 percent of residential trips would be associated with local (within San Francisco) travel. These trip distribution patterns were used as the basis for assigning project trips to local streets in the project area, for the purpose intersection level of service analysis.

TABLE 2
PROJECT PERSON-TRIP GENERATION

PROPOSED LAND USE	SIZE	DAILY PERSON- TRIP RATE ^a	TOTAL DAILY PERSON -TRIPS	TOTAL PM PEAK HOUR PERSON- TRIPS ^c	EMPLOYEES PM PEAK HOUR PERSON- TRIPS ^d	VISITORS PM PEAK HOUR PERSON- TRIPS ^d	RESIDENTS PM PEAK HOUR PERSON- TRIPS ^d
SITE A:							
School	56,430 gsf	n/a	1,775 ^b	132	2	130	n/a
Residential (elderly housing units)	105 units	5 trips/ unit	525	8	n/a	n/a	8 ^e
TOTAL 'SITE A' PERSON-TRIPS			2,300	140	2	130	8
SITE B:							
Retail	9,900 gsf	150 trips/ 1,000 gsf	1,485	59	5	54	n/a
Residential (two-bedroom units)	70 units	10 trips/unit	700	120	n/a	60	60
TOTAL 'SITE B' PERSON-TRIPS			2,185	179	5	114	60
TOTAL PROJECT PERSON-TRIPS			4,485	319	7	244	68

- Notes:
- ^a - The daily person-trip generation rate for the elderly housing component of Site A was based on information obtained from the 1400 Pine Street senior housing project, in consultation with the City and County of San Francisco Planning Department.
The daily person-trip generation rates for the retail and residential components for Site B were obtained from the *Guidelines For Environmental Review: Transportation Impacts*, July 1991, Appendix 1, published by the City and County of San Francisco Planning Department.
 - ^b - The daily person-trips for the school component of Site A was based on information provided by the St. Mary's Day School and Catholic Center.
 - ^c - The PM peak hour person-trips for the school component of Site A were obtained from existing data provided by the St. Mary's Day School and Catholic Center. The PM peak hour person-trips for the elderly housing component of Site A were based on information obtained from the Pine Street senior housing project. The PM peak hour person-trips for the proposed retail and residential components of Site B were derived from the daily person-trips, based on the PM peak percentages provided in the *Guidelines For Environmental Review: Transportation Impacts*, July 1991, Appendix 1, published by the City and County of San Francisco Planning Department.
 - ^d - The employee, visitor, and resident split percentages were obtained from the *Guidelines For Environmental Review: Transportation Impacts*, July 1991, Appendix 2, published by the City and County of San Francisco Planning Department.
 - ^e - The person-trip generation for the elderly housing component of Site A includes both residents and visitors.

Source: Korve Engineering, September 1996.

TABLE 3
PROJECT VEHICLE-TRIP GENERATION

PROPOSED LAND USE	SIZE	TOTAL DAILY VEHICLE-TRIPS ^a	TOTAL PM PEAK HOUR VEHICLE-TRIPS	EMPLOYEES PM PEAK HOUR VEHICLE-TRIPS ^b	VISITORS PM PEAK HOUR VEHICLE-TRIPS ^c	RESIDENTS PM PEAK HOUR VEHICLE-TRIPS ^d
SITE A:						
School	56,430 gsf	405	66	2	64	n/a
Residential (elderly housing units)	105 units	N/A	8	n/a	n/a	8 ^e
TOTAL 'SITE A' PERSON-TRIPS		405	74	2	64	8
SITE B:						
Retail	9,900 gsf	225	9	0	9	n/a
Residential (two-bedroom units)	70 units	92	18	n/a	9	9
TOTAL 'SITE B' PERSON-TRIPS		317	27	0	18	9
TOTAL PROJECT PERSON-TRIPS		842	101	2	82	17

- Notes:
- a - The daily vehicle-trips for the school component of Site A were based on information provided by St. Mary's Day School and Catholic Center.
The daily vehicle-trips for the retail and residential components of Site B were derived from the PM peak hour vehicle-trips, based on PM peak hour percentages provided in the Guidelines For Environmental Review: Transportation Impacts, July 1991, Appendix 1, published by the City and County of San Francisco, Planning Department.
 - b - The employee PM peak hour vehicle-trips for the school component of Site A were based on information provided by St. Mary's Day School and Catholic Center.
The employee PM peak hour vehicle-trips for the retail component of Site B were derived from mode split information provided by the Planning Department.
 - c - The visitor PM peak hour vehicle-trips for the school component of Site A were based on information provided by St. Mary's Day School and Catholic Center.
The visitor PM peak hour vehicle-trips for the retail and residential components of Site B were based on mode split information provided by the Planning Department and 1990 Census Journey-to-Work survey data.
 - d - The residential PM peak hour trips generated by the elderly housing component of Site A were assumed to be all auto trips in order to analyze a worst-case traffic analysis.
The residential PM peak hour vehicle-trips for the residential component of Site B were based on 1990 Census Journey-to-Work survey data.
 - e - The vehicle-trip generation for the elderly housing component of Site A includes both residents and visitors.

Source: Korve Engineering, September 1996.

TABLE 4
TRIP DISTRIBUTION PATTERNS

PLACE OF RESIDENCE	SCHOOL ^a	RETAIL ^b	RESIDENTIAL ^c
San Francisco:	79%	38%	93%
Superdistrict 1:	28%	19%	87%
Superdistrict 2:	13%	8%	2%
Superdistrict 3:	25%	7%	2%
Superdistrict 4:	13%	4%	2%
East Bay	6%	10%	3%
North Bay	0%	7%	2%
South Bay	15%	10%	2%
Out of Region	0%	35%	0%

Notes: ^a - Trip distribution percentages for the proposed school were based on existing student zip code information provided by the St. Mary's Day School and Catholic Center.

^b - Trip distribution percentages for the proposed retail component of the project were obtained from the City and County of San Francisco Planning Department.

^c - Trip distribution percentages for the proposed residential component of the project were obtained from 1990 Journey to Work Census Data.

Source: Kolve Engineering, September 1996.

Traffic

Local Intersection Traffic. Seven intersections in the project vicinity were studied to determine the potential effects of project-generated traffic (see Figure 27, page 92). These intersections, selected by the transportation section of the San Francisco Planning Department, include Broadway/Columbus Avenue, Jackson Street/Kearny Street, Jackson Street/Columbus Avenue, Washington Street/Kearny Street, Washington Street/Montgomery Street/Columbus Avenue, Clay Street/Battery Street, and Washington Street/The Embarcadero. [A discussion of the methodology used in the analysis of the study intersections can be found in the *Kearny/Columbus Project Transportation Study* by Kolve Engineering, September 1996, on file at San Francisco Planning Department.] The analysis considers weekday PM peak-hour (4:30-5:30 p.m.) travel conditions at the study intersections under three scenarios (existing, existing-plus-project, and year 2010 cumulative-plus-project). The discussion below summarizes information contained in Table 5, page 93.



Source: During Associates after Korve Engineering

TRAFFIC STUDY INTERSECTIONS **FIGURE 27**

TABLE 5
INTERSECTION LEVEL OF SERVICE

NO.	INTERSECTION	EXISTING		EXISTING PLUS PROJECT		YEAR 2010	
		DELAY (secs.)	LOS ^a	DELAY (secs.)	LOS ^a	DELAY (secs.)	LOS ^a
1	Broadway/ Columbus Avenue	11.5	B	11.6	B	12.4	B
2	Jackson Street/ Kearny Street	7.0	B	7.1	B	7.6	B
3	Jackson Street/ Columbus Avenue	9.2	B	11.5	B	14.2	B
4	Washington Street/ Kearny Street	5.8	B	6.3	B	6.7	B
5	Washington St./ Montgomery St./Columbus Ave.	8.0	B	8.1	B	9.0	B
5	Clay Street/ Battery Street	6.8	B	6.8	B	7.2	B
7	Washington Street/ The Embarcadero	8.6	B	9.1	B	13.2	B

Note: ^a - Level of Service determined from the *1985 Highway Capacity Manual (Updated 1994)*, Chapter 9.

Source: Korve Engineering, September 1996.

Level of Service (LOS) of an intersection is a measure of the ability of the intersection to accommodate traffic volumes. The LOS is based on the average stopped-delay-per-vehicle-per-lane for various movements within the intersection. Intersection LOS ranges from LOS A, which indicates free-flowing conditions with short delays, to LOS F, which indicates congested conditions with extremely long delays (Appendix C includes more detailed descriptions of Levels of Service at signalized intersections). LOS D (or better) represents traffic operations at signalized intersections within the acceptable LOS range. LOS E (or worse) represents conditions that are not within the acceptable LOS range.

As shown in Table 5, under existing conditions all seven study intersections operate at LOS B, an acceptable LOS. The addition of project-generated traffic would increase intersection delays by an average of 0.5 seconds, but would not cause a change in LOS. Therefore, all study

intersections would continue to operate at acceptable levels of service in the weekday PM peak-hour.

Cumulative growth forecasts to year 2010 were based on an annual growth rate of one percent, or 16.1 percent over 15 years. Under cumulative conditions with the project, all study intersections would experience small increases in delays (averaging 1.2 seconds), but all would continue to operate at LOS B in the weekday PM peak-hour, an acceptable service level. This would therefore be considered a less-than-significant impact.

Transit

Stops for approximately 12 MUNI bus lines are within walking distance of the project site, including three at the project block itself. The proposed project would generate approximately 75 transit trips (50 inbound and 25 outbound) during the weekday PM peak hour. Most MUNI lines, whose maximum load points occur near the project site, currently operate near or above peak load factor standards in peak directions. Therefore, they have little excess capacity to absorb any new demand, including the additional transit trips that would be generated by the proposed project. These lines include 1-California, 9AX-San Bruno 'A' Express, 30-Stockton, 45-Union-Stockton, and 83-Pacific. The project would generate about 41 transit trips (or 55 percent of the total 75 trips) spread among 84 buses on these five lines, which would yield an average of less than one rider per vehicle. This increase would not have a significant impact on transit service.

Pedestrian Movements

Pedestrian access to the proposed Site A buildings would occur mid-block along the Kearny Street frontage and there would be pedestrian access to the garage on Jackson Street. Pedestrian access to the proposed Site B building would occur mid-block along the Columbus Avenue frontage; internal access would also occur from within the parking garage (discussed below).

A pedestrian crosswalk analysis was conducted at the intersections of Kearny/Jackson and Kearny/Washington to determine weekday PM peak hour conditions under the existing-plus-project scenario. Pedestrian LOS was calculated using the Transportation Research Board's *Highway Capacity Manual*.⁴ For pedestrian crosswalks, pedestrian flow rates, or the number of

pedestrians passing a point per unit of time, are the basis for the flow regimen designation. Operating conditions on pedestrian elements are evaluated in terms of pedestrian flow categories or regimen, which relate to the density of pedestrians in a specific period of time (pedestrians per foot of clear sidewalk width per minute) to the quality of pedestrian flow (the difficulty of maintaining walking paths and speeds on a sidewalk). Appendix C contains further explanation of pedestrian levels of service, and depictions of sidewalk conditions for each flow regimen. Under existing and existing-plus-project conditions, all study pedestrian facilities operate or would operate at LOS B or better. This is considered an acceptable service level, and no corrective measures would be required.

Parking

A survey of off-street parking supply and occupancy conditions within a two-block radius of the proposed project site was conducted.⁵ A total of 18 parking facilities, consisting of 2,043 parking spaces, was surveyed. Based on this survey, off-street occupancy for the entire study area is estimated to be approximately 91 percent during the weekday midday period (1:00-3:00 p.m.), which is considered essentially full.

On-street parking in the project study area is primarily available at one-hour and two-hour meters, which are typically well utilized and have a high turnover rate. Most of the commercial and retail businesses in the area do not provide on-site parking for their customers, and there are many on-street loading facilities in the area. Along the Kearny Street frontage, there is no on-street parking on the east side of the street, except for a two-hour tour bus parking zone accommodating up to three buses. There are currently 12 metered parking spaces on the Washington Street frontage, six metered parking spaces on the Jackson Street frontage, and nine metered spaces on the Columbus Avenue frontage.

The parking requirement represents the amount of parking required by the *City Planning Code*, based on proposed uses. The parking demand for the project represents the actual estimated demand generated by the project (the estimated number of vehicles that would need spaces in the project area during the peak parking demand period. Table 6, page 96, presents the project parking supply and demand, and the applicable *City Planning Code* requirements.

TABLE 6
PROJECT PARKING SUPPLY, REQUIREMENTS, AND PEAK DEMAND

LAND USE		REQUIREMENTS ^a	DEMAND ^b	SUPPLY
SITE A	School	0	4	147 ^c
	Elderly Housing	21	6	7
TOTAL SITE A		21	10	154
SITE B	Retail	0	35	0
	Residential	70	105	85
TOTAL SITE B		70	140	85
TOTAL PROJECT		91	150	239

Notes: ^a - Planning Code Requirements:

School = 0 spaces, per Section 161 (c)

Elderly Housing = one-fifth of 1 space/dwelling unit = $105/5 = 21$ spaces

Retail = 0 spaces, per Section 161 (d)

Residential = 1 space/dwelling unit = 70 spaces

^b - Based on City guidelines (parking turn-over) not on the person-trip generation in Table 2.

^c - The 147 parking spaces on Site A would be public parking spaces. No parking would be provided for the school.

Source: Kolve Engineering, September 1996.

As shown in Table 6, proposed uses on Site A would generate a total weekday peak parking demand for 10 parking spaces (four for the school and six for the elderly housing). The proposed uses on Site B would generate a total weekday peak parking demand for 140 parking spaces (105 for residential uses and 35 for retail uses). The proposed project would provide a total of 239 off-street parking spaces, of which 154 spaces would be provided at Site A and 85 would be provided at Site B. Of the 154 spaces at Site A, 147 would be publicly accessible and the remaining seven would be residential. The 85 spaces at Site B would be valet residential spaces, and no parking would be provided for proposed retail uses.

The parking demand for four spaces created by the school could be met in the 147-space publicly accessible parking provided on Site A. The parking demand for six spaces created by the elderly housing component would be met by the proposed supply of seven residential spaces. The demand for 35 parking spaces created by the proposed retail uses at Site B could be met in the 147-space parking garage provided on Site A, or in other nearby (off-site) parking

facilities (the parking survey indicates that there are approximately 185 spaces available in the area during the midday peak period). Based on the currently proposed supply, there would be an unmet parking demand for 20 spaces generated by the residential component of Site B.

Site A is located within the Chinatown Residential Neighborhood Commercial District. As such, the school component at Site A is exempt from off-street parking requirements (Section 161). The proposed project would, however, be required to provide 21 parking spaces for the elderly housing component at Site A. The project would therefore provide 12 fewer parking spaces at Site A than required by the *Planning Code*. Site B is located within the Chinatown Community Business District. As such, the retail component at Site B is exempt from off-street parking requirements (Section 161). The proposed project would, however, be required to provide 70 parking spaces for the residential component at Site B; the 85 valet spaces proposed would meet this requirement.

Loading Activity

It is estimated that Site A would generate approximately 7.7 deliveries per day, which is equivalent to a demand for 0.35 spaces in an average hour and 0.44 spaces in the peak hour. Site B is estimated to generate approximately 4.3 daily deliveries, equivalent to 0.20 spaces/average hour and 0.25 spaces/peak hour. Delivery vehicles would consist primarily of vans and two-axle trucks.

The *City Planning Code* requires one off-street loading space to be provided at the project site. The project is not proposing any spaces since van loading for Site A would be accommodated within the Site A garage (accessible via Jackson Street) and loading for Site B could also occur within the Site B garage (accessible via Washington Street). Approval of an on-street loading zone on Washington Street or Columbus Avenue may be requested by the project sponsor for Site B. Larger delivery vehicles, however, such as big moving vans, would not fit in the building garages and would need to park on the street. While inconvenient, these larger trucks would not cause significant traffic impacts due to the infrequent demand for large-scale loading by the project (it is unlikely that the low-income senior housing would create a demand for larger moving vans and the 70 units of market-rate housing on Site B would not generate frequent use of large loading vehicles during peak hours).

Demolition, Excavation, and Construction

Temporary construction-related transportation impacts would result from construction employees and truck movements to and from the site during demolition of the Colombo Building (Site B), excavation of new garages and foundations, and building activity. Project construction would require approximately 22 to 24 months.

While most construction staging would occur on-site, it is anticipated that sidewalk closures would be required around the site (Kearny Street, Jackson Street, Washington Street and Columbus Avenue), and that adjacent curb lanes would be occupied to provide pedestrian detours or that pedestrians would be rerouted to sidewalks across the streets. Temporary relocation of bus stops adjacent to the site may also be required, subject to MUNI review and approval. Double parking of trucks along Kearny Street may also be required for trucks unloading materials to Site A and some double parking may occur on Columbus Avenue or Washington Street. Lane and sidewalk closures are subject to review and approval by the Department of Public Works (DPW). A revocable encroachment permit from DPW would be required if materials storage and/or project staging occurred within IIs Lane, one of two stub streets located within the project block.

Any truck traffic occurring during the hours of 7:00-9:00 a.m. and 3:30-6:00 p.m. would coincide with peak-hour traffic and could impede traffic flow. The impact of lane closures and construction truck traffic would be a lessening of the capacities of streets, slowing movement of traffic (including MUNI buses). Lane blockage on Kearny Street, Washington Street or Columbus Avenue by queued trucks, if it were to occur, would reduce the capacity of these streets and interfere with the operation of transit vehicles on Kearny Street or Columbus Avenue. Limiting truck movements to the hours between 9:00 a.m. and 3:30 p.m. would minimize disruption of the general flow of traffic on adjacent streets during AM and PM peak periods (see mitigation measure on page 109).

There would be a temporary demand for parking for construction workers. During preliminary construction activities, it is anticipated that construction workers would park at remote locations, and be shuttled in by the contractor. Once the proposed project garages are constructed, this demand could be accommodated on site. In general, disruption due to construction activities would be temporary rather than a long-term effect on the neighborhood.

NOTES - Transportation

¹ *Alternatives to the Replacement of the Embarcadero Freeway and the Terminal Separator Structure DEIS/DEIR*, 92.202E and 94.060E, published August 25, 1995.

² Memorandum to file *Updated Future Land Use Data Sensitivity Analysis*, April 24, 1994 conducted for the *Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure EIS/EIR*

³ Information on transportation was based on *Kearny/Columbus Project Transportation Study*, by Kolve Engineering, September 1996. This report is on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

⁴ *Highway Capacity Manual*, Special Report 209, Transportation Research Board, National Research Council, Washington, D.C., 1985 (updated 1994), Chapter 13.

⁵ The survey was conducted by Kolve Engineering on Thursday, November 16, 1995. It included occupancy data for a weekday midday period (1:00-3:00 p.m.).

F. AIR QUALITY

Air quality impacts from a project result from project construction and operation. Construction emissions, primarily dust generated by earthmoving activities and criteria air pollutants emitted by construction vehicles, have short-term effects on air quality. Operational emissions, generated by project-related traffic and by combustion of natural gas for building space and water heating, continue to affect air quality throughout the lifetime of the project.

The analysis in this section provides information that can be used to assess the Kearny/Columbus project in relation to thresholds of significance recommended by the Bay Area Air Quality Management District's (BAAQMD's) *Guidelines for Assessing Impacts of Projects and Plans* (Guidelines). For regional air quality, a significant impact is defined as an increase in emissions of an ozone precursor or PM₁₀ exceeding BAAQMD's recommended thresholds of significance. The District considers an increase of 80 pounds per day for any regional pollutant to represent a significant adverse impact.¹

The District also has a threshold of significance for carbon monoxide of 550 pounds per day. Exceeding this threshold is not in itself considered a significant impact, but would trigger the need for localized carbon monoxide modeling.

CONSTRUCTION EMISSIONS

Construction activities would temporarily affect local air quality. Construction activities would not involve burning of any materials and would not create objectionable odors. Grading and other construction activities would temporarily affect local air quality for a period of months, causing a temporary increase in particulate dust and other pollutants. Dust emissions during excavation would increase particulate concentrations near the site. Under high winds, exceeding 12 miles per hour, localized effects, including human discomfort, might occur downwind from blowing dust. Construction dust is composed largely of large particles that settle out of the atmosphere more rapidly with increasing distance from the source. More of a nuisance than a hazard for most people, if exposed this dust could affect persons with respiratory diseases, as well as sensitive electronic or communications equipment.

OPERATIONS EMISSIONS

Upon completion, project operation would affect local air quality by increasing the number of vehicles on project-impacted roads and at the project site, and by introducing stationary emissions to the project site. Transportation sources would account for over 90 percent of operational project-related emissions and there would be no significant air quality violations due to project-generated traffic. Stationary source emissions, generated by combustion of natural gas for building space and water heating, would account for about ten percent of total project-generated emissions. This ten percent would not add sufficiently to the traffic emissions to cause the total to violate any State or Federal standards and would be considered less than significant.

Local Impacts

On the local scale, the project would change traffic on the local street network, changing carbon monoxide levels along roadways used by project traffic. Carbon monoxide is an odorless, colorless poisonous gas whose primary source in the Bay Area is automobiles. Concentrations of this gas are highest near intersections of major roads.

The URBEMIS-5 computer program was applied to project daily trip generation under winter conditions to estimate total project-related carbon monoxide emissions. The resulting emission

of 255 pounds/day of carbon monoxide is below the BAAQMD threshold of significance of 550 pounds per day. According to BAAQMD guidelines, projects whose total daily CO emissions do not exceed 550 pounds per day, do not affect intersections operating at level of service D/F, do not cause level of services to decline to LOS D/F, or do not increase traffic volumes on nearby roadways by more than ten percent would not have a significant impact on local carbon monoxide concentrations. The URBEMIS-5 results and traffic analysis show that these thresholds are not exceeded and therefore the impacts are not significant.

Regional Impacts

Project traffic would also have an effect on air quality outside the project vicinity. Trips to and from the project would result in air pollutant emissions over the entire Bay Area. To evaluate emissions associated with the project, the URBEMIS-5 computer program, developed by the California Air Resources Board, was employed.

The daily increases in regional emissions from auto travel is shown in Table 7, below, for reactive organic gases (hydrocarbons) and oxides of nitrogen (two precursors of ozone), carbon monoxide and PM₁₀ (particulate matter, 10 micron).

TABLE 7
PROJECT REGIONAL EMISSIONS IN POUNDS PER DAY²

	REACTIVE ORGANIC GASES	NITROGEN OXIDES	CARBON MONOXIDE	PM ₁₀
Project Daily Emission	21.8	17.0	255.0	2.0
BAAQMD Threshold	80.0	80.0	550.0	80.0

Guidelines for the evaluation of project impacts issued by the Bay Area Air Quality Management District consider emission increases to be significant if they exceed 80 pounds per day for regional pollutants (ROG, NO_x, PM₁₀). Project emissions shown in Table 7 are below these criteria for those pollutants, so the proposed project would have a less than significant impact on regional air quality.

NOTES - Air Quality

¹ Bay Area Air Quality Management District, *BAAQMD CEQA Guidelines: Assessing the Air Quality Impact of Project and Plans*, 1995.

² Estimates of regional emissions generated by project traffic were made using a program called URBEMIS-5. Inputs to the URBEMIS-5 program include trip generation rates, vehicle mix, average trip length by trip type and average speed. Trip generation rates for project land uses were provided by the project transportation consultant. Average trip lengths and vehicle mixes for the Bay Area were used. Average speed for all types of trips was assumed to be 25 m.p.h. The analysis assumed a 1997 vehicle mix. The URBEMIS-5 runs assumed summertime conditions for ROG, NO_x and PM₁₀. Wintertime conditions were assumed for URBEMIS-5 runs to calculate CO emissions.

G. EMPLOYMENT AND HOUSING

EMPLOYMENT

The previous project's potential employment was described and analyzed on pages 134 and 135 of the FEIR. The FEIR estimated a net increase of 703 jobs on site, resulting from the development office and retail uses. The FEIR also described secondary employment and income resulting from the project, including temporary project construction labor and permanent employment generated through the multiplier effect (i.e., each person employed on site would generate additional off-site employment through expenditure for goods and services). The current proposal includes a different mix of uses than was previously proposed; therefore, the analysis of employment in the FEIR is no longer relevant.

Under the proposed project, the Colombo Building would be demolished and the approximately 40 employees currently working there would be displaced. At full operation, the proposed project would accommodate approximately 50 full-time jobs (split evenly between Site A and Site B). These jobs would serve the retail, educational, housing, and janitorial/maintenance functions on site. Secondary employment and income would result from temporary construction employment while the project is being built, and from permanent project employment; through the multiplier effect.

HOUSING

The Final EIR discussed the previous project's effects on the housing market in San Francisco (pages 136 to 147). This included: (1) the pre-project effects resulting from the demolition of affordable senior housing; (2) projected demand housing generated by new uses on site;

(3) fulfillment of the Office Affordable Housing Production Program (OAHPP) housing requirements; (4) implications for the Chinatown housing market; and (5) the cumulative and indirect effects of the project on housing in San Francisco.

Since the currently proposed project contains no office space and is primarily residential, it would help relieve housing demand in San Francisco and would not contribute to any cumulative housing demand. A discussion of residence patterns in San Francisco and the region and of housing demand due to increased employment, are therefore no longer relevant for this SEIR and are not included.

The proposed project results from many years of negotiation among the project sponsors, City agencies, and the former I-Hotel Block Citizen's Advisory Committee, over the disposition of Site A (which formerly contained the I-Hotel). The I-Hotel was a low-cost, long-term residential hotel occupying the northern lot of Site A. Tenants were evicted from the 164-unit hotel on August 4, 1977, and the building was demolished in 1979. The other two vacant lots on the two sites (Lots 5 and 11) were also occupied by low-cost, long-term residential hotels. Lot 5 (on Site B) was occupied by the 70-unit Bell Hotel, which was vacant for five years prior to its demolition in 1979. Lot 11 (on Site A, adjacent to the I-Hotel site), was occupied by the 30-unit Victory Hotel, which was also demolished in 1979. The Memorandum of Understanding that was signed in 1987 between the Mayor, the Citizens' Advisory Committee and the project sponsor of the previous project (Appendix E in the FEIR) is no longer applicable to the proposed project.

The 104 units of affordable senior housing proposed are intended to support an elderly population capable of independent living. The proposed units can be adapted to be fully disabled-accessible, anticipating that as the resident population ages, mobility could decrease. The 70 market-rate units would accommodate current and future demand for housing in the Downtown & Vicinity, particularly for workers in the Financial District, North Beach, and Jackson Square.

H. HAZARDS

Construction of the proposed project would require excavation of soil to an estimated depth of 12 to 28 feet below the ground surface. Due to historic land uses associated with the presence of hazardous materials on the project site, Treadwell & Rollo, geotechnical and environmental

consultants, conducted hazardous materials site assessments and investigations. The purpose of these studies was to characterize the chemical quality of the soil and to identify appropriate disposal or remediation methods for the soil.

Treadwell & Rollo conducted a Phase II Site Assessment in 1996. The assessment consisted of subsurface exploration (i.e., soil and groundwater sampling) and chemical analysis of samples. No significant concentration of petroleum hydrocarbons, VOCs, SVOCs, and metals were detected in the soil and groundwater, with the exception of lead in the fill layer which blankets the site to a depth of approximately 2 feet. Lead is a human toxin and is listed as a persistent and bioaccumulative toxic substance in Title 22 of the *California Code of Regulations*. Based on these regulations, soil containing total lead levels greater than the Total Threshold Limit Concentrations (TTLC) of 1,000 milligrams per kilogram (mg/Kg) would be classified as a hazardous waste for disposal purposes; similarly, if soluble lead levels exceed the Soluble Threshold Limit Concentration (STLC) of 5 milligrams per liter (mg/L), the soil would require disposal as a hazardous waste. The presence of lead on the project site would necessitate the implementation of health and safety measures, dust control procedures, and proper disposal of the excavated material as required by the Bay Area Air Quality Management District, the California Occupational Safety and Health Administration, and federal, state and local laws including Titles 22 and 23 of the *California Code of Regulations* (hazardous materials and water quality), and the City's Hazardous Materials Ordinance.. These measures would be described in a site mitigation plan (SMP).

I. GROWTH-INDUCING IMPACTS

The FEIR (pages 147 to 149) considered the potential growth-inducing impacts of a project containing 178,100 sq. ft. of office space and 21,600 sq. ft. of retail space. It found that the project could have growth-inducing effects in and around North Beach and Chinatown, if marketed successfully, by demonstrating a market for office space in this area. These effects, however, could have been limited by interim zoning controls and proposed zoning changes for Chinatown and North Beach. The Final EIR also found that new employment created on site would increase the demand for housing in San Francisco and other parts of the Bay Area.

The current proposal consists of 104 units of elderly housing, 70 units of market-rate housing, a school, church, and other community facilities and retail. No commercial office space is

proposed under the current project; therefore, the growth-inducement discussion in the Final EIR is no longer relevant.

As described above in Section G, Employment and Housing, the types of employment on-site would change as a result of the proposed project, but there would be a small increase in total on-site employment (about 10 jobs) compared to the FEIR's 700 positions. Employment associated with the proposed project would represent jobs that would be expected to occur in San Francisco without the project. This is because approximately one-half of on-site employees would be relocating from existing facilities of the Archdiocese of San Francisco, while the other half would fall within the range of population growth already occurring in San Francisco and the region.

It is expected that some downtown workers, including some associated with the proposed project, would want to live in San Francisco. Employment growth, however, is not related directly to increases in demand for housing and city services to residents, as some new jobs would be held by individuals who already live and work in San Francisco; who prefer to live in San Francisco but previously either did not work, or worked outside the City; who prefer to live in surrounding communities; or who are unable to afford or locate housing in the City.

Because the project would be built in a developed urban area, no expansion of the municipal infrastructure not already under consideration would be required to accommodate new development and increased employment due to, or induced by, the project.

V. MITIGATION MEASURES PROPOSED TO MINIMIZE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

The FEIR lists mitigation measures on pages 150 to 159. Those measures that are still applicable to the project are included in this chapter. Those measures from the FEIR that are no longer relevant are discussed in the respective environmental category. The two paragraphs below are included and expanded from the FEIR for informational purposes.

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, voluntarily adopted by the project sponsors or project architects and contractors and are thus proposed; and some are under consideration. Implementation of some may be the responsibility of other agencies. Measures under consideration may be required by the City Planning Commission as conditions of project approval. Each mitigation measure and its status is discussed below.

Several items are required by law that would serve to mitigate impacts; they are summarized here for informational purposes, and may appear below. These measures include: no use of mirrored glass on the building to reduce glare, as per City Planning Commission Resolution 9212; limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code, 1972); implementation of geotechnical assessment and recommendation; and observance of State and Federal Occupational Safety and Health Administration safety requirements related to handling and disposal of hazardous materials.

Measures not required by legislation but which would also serve to mitigate environmental impacts appear below. Mitigation measures preceded by an asterisk (*) are from the FEIR, in some cases modified slightly.

WIND

- * ● The open terraces on Site A would be protected by wind shields. Other wind baffling devices would be included in the project as necessary to reduce winds in the rooftop open space on Site B to acceptable levels.

● **HISTORIC, ARCHITECTURAL AND CULTURAL RESOURCES**

MEASURES PROPOSED AS PART OF THE PROJECT

- The project sponsors would retain the services of an archaeologist.

Site A: Because planned construction would entail excavation and topographic modification to depths that would exceed the level of previous subsurface archaeological investigations, the project sponsors have agreed to retain the services of an archaeologist who would conduct a focused program of systematic on-site monitoring and data recovery procedures during excavation of Site A. During the monitoring program, the project sponsors would designate one individual on-site as its/their representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources, should they be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist would document, preserve, and recover the cultural material. The archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration, and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Environmental Review shall receive three copies of the final archaeological report.

- * **Site B:** Given the location and depth of the excavation proposed, and the likelihood that archaeological resources would be encountered on the project site, the project sponsors have agreed to retain the services of an archaeologist. Following demolition of the Colombo Building, but during removal of foundation materials if determined necessary by the archaeologist, as well as during excavation, the archaeologist would carry out a pre-excavation testing program to better determine the probability of finding cultural and historical remains. The testing program would use a series of mechanical, exploratory borings, or trenches, and/or other testing methods determined by the archaeologist to be appropriate.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist would submit a written report to the Environmental Review Officer (ERO), with a copy to the project sponsors. If the archaeologist determines that further

investigations or precautions are necessary, he/she shall consult with the ERO and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional mitigation measures would be implemented by the project sponsors and might include a program of on-site monitoring of all site excavation, during which the archaeologist would record observations in a permanent log. The monitoring program, whether or not there are finds of significance, would result in a written report to be submitted first and directly to the ERO, with a copy to the project sponsors. During the monitoring program, the project sponsors would designate one individual on-site as its/their representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist would immediately notify the ERO, and the project sponsors would halt any activities that the archaeologist and the ERO jointly determine could damage such cultural resources. Ground disturbing activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the archaeologist would prepare a written report to be submitted first and directly to the ERO, with a copy to the project sponsors, which would contain an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific mitigation measures to be implemented by the project sponsors. These additional mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of the cultural material.

Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration, and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Environmental Review shall receive three copies of the final archaeological report.

Should human remains of Native American origin be encountered during excavation or construction activities and to assure preservation and protection of the remains in a respectful manner, the project sponsors would contact the County Coroner's office and the Native American Heritage Commission, pursuant to the procedures set forth in Section 7050.5 of the *Health and Safety Code* and Sections 5097.9 to 5097.99 and 5097.991 of the *Public Resources Code*.

- Prior to the demolition of the Colombo Building, the building could be documented for the Historic American Buildings Survey (HABS). HABS documentation would be planned in advance in a conference between the preparer and officials of the National Park

Service in order to match the level of documentation to the specific building. For the building, a full set of drawings, large format archival photography, and a written history would be appropriate.

TRANSPORTATION

MEASURES PROPOSED AS PART OF THE PROJECT

- * ● Generally during the construction period, construction truck movement would be permitted only between 9:00 a.m. and 3:30 p.m. to minimize peak-hour traffic (including transit) conflicts. The project sponsors and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, Golden Gate Transit, and the San Francisco Planning Department to determine feasible traffic mitigation measures to reduce traffic congestion, including transit disruption (for example, potential relocation of bus stops), and pedestrian circulation impacts during construction of this project and other nearby projects that are planned for construction or which later become known. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsors would ensure that the construction contractor coordinate with construction contractor(s) for any concurrent nearby projects that are planned for construction or become known. An exception would be made during underpinning, shoring and excavation to permit construction truck movements between 7:00 a.m. and 3:30 p.m. and during the approximately 20 hours for continuous pour of the mat foundation. Prior to issuance of foundation permits, project sponsors would consult with the Department of Parking and Traffic to establish a route for truck traffic that would cause the least interference with morning commute traffic on City streets.
- The project contractor(s) would determine the location of an off-site parking facility for construction workers during the construction period, in the event that on-site parking is unavailable.
- * ● The project sponsors would, in consultation with the MUNI, install eyebolts or make provisions for direct attachment of eyebolts for MUNI trolley wires on the proposed project building wherever necessary, or agree to waive the right to refuse the attachment of eyebolts to the proposed buildings if such attachment is done at City expense.
- While subsurface sidewalk vaults are discouraged, if vaults are included in the project, or because the basement would extend beneath street rights-of-way, the project sponsors would design subsurface vaults to allow for possible future widening of adjacent streets. Vault design would be of sufficient strength to carry maximum vehicular live and dynamic loads. Design of the vault area to accommodate street trees would also be made, subject to Department of Public Works approval. In addition, should vaults exist or be installed as part of the project, the project sponsors would accommodate and pay for the installation of all subsurface footings, supports, and foundations as may be required for future public improvements, such as street lights, street trees, trolley wire poles, signs, benches, transit shelters, etc., within project vault areas. Placement of such improvements is entirely within the discretion of the City.

MEASURES NOT INCLUDED IN THE PROJECT

- * ● The project sites are on a block which is on the periphery of the downtown. The Downtown Plan discourages new long-term parking spaces in and around downtown. Parking within the project (other than that for residential tenants) could be operated as short-term parking with a fee structure in accordance with that recommended in the Downtown Plan. This measure is under consideration by the project sponsors and could be required as a condition of project approval.

MEASURES THAT COULD BE IMPLEMENTED BY OTHER AGENCIES

- * ● Work schedules of Pacific Gas and Electric Company and other utilities requiring trenching could be coordinated, so that street disruption would take place during weekends and off-peak hours. This should be done through the San Francisco Committee for Utility Liaison on Construction and Other Projects (CULCOP). In-street utilities should be installed at the same time as the street is opened for construction of the project to minimize street disruption.

The FEIR listed several mitigation measures on pages 152 to 154 that addressed mitigation of potential transportation, circulation and parking impacts for office projects (the contribution of funds for transportation services, the development of a transportation management program and the implementation of the transportation improvements described in the *Downtown Plan*). The proposed project evaluated in this Supplemental EIR would not contain office space and these measures are not applicable.

The noise mitigation measures in the FEIR listed on pages 154 and 155 are now required by the San Francisco Noise Ordinance and are not restated in this chapter.

HAZARDS

MEASURES PROPOSED AS PART OF THE PROJECT

- The project sponsors have agreed to prepare a soils investigation report for the project site by a qualified consulting firm (with California-licensed Geotechnical Engineers). As part of the study, the soils would be tested for the presence of any hazardous waste contamination that might be found at the project site, including PCB-containing materials. In the event that any hazardous wastes are identified which exceed the State and Federal standards (including acceptable levels of petroleum hydrocarbons at Class II or III landfills), the project sponsors would agree to implement a Site Mitigation Plan (SMP) prepared by the consultant. The SMP would detail the specific treatment of wastes, including sampling, monitoring and other soil handling procedures to be performed by a licensed contractor in accordance with the State and Federal regulations and the site-specific health and safety requirements. Remediation of any hazardous contamination that might be found at this property could be under the supervision of the San Francisco Department of Public Health, if accepted by that Department, as delegated by the California EPA Department of Toxic Substances Control (DTSC) pursuant to SB 1248; if the City Health Department did not choose to accept supervision, then the activity would be supervised by the DTSC. The SMP would also include implementation of a

health and safety plan for workers on the site and a notification on the site for construction workers regarding location and type of contamination present. After the project site has been remediated, the consultant that prepared the SMP would certify that the site is clean and useable for the proposed project.

- * ● In order to reduce potential injury to building occupants during an earthquake or other catastrophic emergency, an excavation and emergency response plan would be developed by the project sponsors or building management staff, in consultation with the Mayor's Office of Emergency Services to ensure coordination between the City's emergency planning activities and the project's plan and to provide for building occupants in the event of an emergency. The project plan would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance by the Department of Public Works of final building permits.
- * ● To expedite implementation of the City's emergency response plan, the project sponsors would prominently post information for building occupants/visitors concerning what to do in the event of a disaster.

CONSTRUCTION AIR QUALITY

MEASURES PROPOSED AS PART OF THE PROJECT

- * ● The project sponsors would require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that nonpotable water be used for dust-control activities. Therefore, the project sponsors would require that the contractor(s) obtain reclaimed water from the City Clean Water Program for this purpose.
- The project sponsors would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants through the prohibition of idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

The FEIR listed two mitigation measures on pages 155 and 156 that addressed air quality measures related to traffic and energy impacts. Both these measures were included in the FEIR primarily because of the proposed office use. Since the proposed project would not include office use, these measures are not in this chapter.

The FEIR included three mitigation measures for housing impacts on pages 156 and 157. Since the project in this SEIR is primarily housing, these measures are no longer applicable.

GEOLOGY**MEASURES PROPOSED AS PART OF THE PROJECT**

- * ● One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsors and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project.
- Any groundwater encountered during construction of the proposed project would be subject to requirements of the City's Industrial Waste Ordinance Article 4.1 of the San Francisco Public Works Code (Ordinance Number 19-92) requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. The Bureau of Environmental Regulation and Management of the Department of Public Works must be notified of projects necessitating dewatering and approval must be obtained to discharge to the sewer. That office may require water analysis before discharge.
- * ● Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral movement and settlement survey should be carried out to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsors to perform this monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to monitor potential settlement and subsidence. If, in the judgement of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsors would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsors.
- Should dewatering be necessary, the project sponsors and contractor(s) would follow the geotechnical engineer's recommendations regarding dewatering to avoid settlement of adjacent streets, utilities and buildings that could potentially occur as a result of dewatering. If dewatering were necessary, monitoring wells would be installed by the project sponsor, as required, around the outside of the excavation to monitor the water level throughout the construction period. Recharge of groundwater could be performed if a substantial drop in water levels took place outside of the excavation.
- * ● If dewatering were necessary, groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, and sediment traps in local stormwater intakes during construction would be installed and maintained, if this were found necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works, to reduce the amount of sediment entering the storm drain/sewer lines.

- The project sponsors and contractor(s) would follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems would be modified as necessary in the event that substantial movements were detected.
- * ● During construction, the contractor would sweep streets adjacent to the construction site mechanically or by hand to prevent siltation of storm drains and generation of dust. The contractor would also confine construction equipment, maintenance, and refueling activities to locations where potential petroleum spillage could be contained.

The FEIR contained three mitigation measures for potential energy impacts. These measures are generally part of Title 29 of the *California Code of Regulations* applicable to housing development with which the project must comply. Therefore, they are not included in this chapter.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Sections 15040, 15081, and 15082 of the State CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the proposed project, or by other mitigation measures that could be implemented, as described in Chapter V, Mitigation Measures, pages 106 through 113.

This chapter is subject to final determination by the City Planning Commission as part of its certification process for the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Commission.

The Colombo Building has been evaluated by the State Office of Historic Preservation Office (SOHP) as part of the 1982 North Beach Survey. It has been determined that the building may become eligible for separate listing in the National Register of Historic Places, if more historic or architectural research is performed ("4S" rating). The proposed project, by the demolition of the Colombo Building, would have a potential unavoidable significant adverse impact on the historic resources of the project site.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter describes alternatives contained in the FEIR (pages 163 to 172m) and their current relevance, identifies alternatives to the currently proposed project, discusses environmental impacts associated with these alternatives, and gives reasons the alternatives were rejected in favor of the proposed project. Regardless of the sponsors' reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site.

Analysis of alternatives at different sites for private projects is not required except in very limited circumstances. Whether property is owned or can reasonably be acquired by the project sponsor has a strong bearing on the feasibility of developing a project alternative. This Supplemental EIR does not include an alternate site alternative because the FEIR did not include such an alternative and because the project sponsors have no feasible alternative site available for the proposed project.

The 1987 Final EIR contained seven project alternatives, including:

- A: No Project Alternative
- B: Code Conforming (with Conditional Use) Alternative
- C: Preservation Alternative
- D: Code Conforming 40 Ft. (No Conditional Use) Alternative
- E: Increased Housing Alternative
- F: Chinatown Resource Center and Asian Neighborhood Design Alternative
- G: Reduced Office Space Alternative

As described below, Alternatives B, D, E, and F are no longer considered relevant in the context of this Supplemental EIR. Alternatives A, C, and G are considered relevant to the current project and in addition, two new alternatives — a smaller building on Site A and reduced housing on Site B — have been added and are described below in the context of the current project alternatives.

FEIR ALTERNATIVES NOT INCLUDED IN THIS DOCUMENT**Alternative B: Code Conforming (with CU)**

Alternative B in the FEIR (pages 164 to 166) contained in two buildings 94,000 sq.ft. of office space, 21,600 sq.ft. of retail space, 30,950 sq.ft. of residential space (85 units), and 85 valet parking spaces. This alternative is no longer considered relevant because it sought conformity with a version of the *City Planning Code* that is no longer in effect.¹

Alternative D: 40-Foot-Tall Code Conforming (No CU)

Alternative D in the FEIR (pages 168 and 169) consisted of two structures, both 40 feet in height, with a total of 62,060 sq.ft. of office space, 21,610 sq.ft. of retail space, and 85 parking spaces (no housing provided). This alternative is no longer considered relevant because it sought conformity with a version of the *City Planning Code* that is no longer in effect.²

Alternative E: Increased Housing

Alternative E in the FEIR (pages 170 and 171) increased the housing component of the overall project, resulting in a total development of 107,400 sq. ft. of residential space (240 units in two towers on Site A), 65,700 sq.ft. of office space, 21,600 sq. ft. of retail space, and 85 parking spaces. This alternative is no longer considered relevant because the current proposal consists primarily of housing, and would meet the objective of providing additional housing in Chinatown.

Alternative F: Chinatown Resource Center and Asian Neighborhood Design

Alternative F in the FEIR (pages 172 and 172a) increased the amount of housing and decreased the amount of commercial office and retail space as compared to the previously proposed project, resulting in a total of 57,300 sq. ft. of office space, 53,700 sq. ft. of residential space (120 units), 18,600 sq. ft. of retail space, and on-site parking. This alternative is no longer considered relevant because its objective (to increase the housing component and decrease the office component), has been achieved under the current proposal. It would also exceed the current maximum allowable FAR for commercial uses, for which there are no exceptions under the current Code.

CURRENT ALTERNATIVES

Alternative A: No Project Alternative

Description

This alternative would entail no physical change to the site as it now exists. Site A would remain an excavated, vacant parcel. On Site B, the Colombo Building would be retained, and the adjacent excavated parcel would remain vacant. Alternative A in the FEIR was also a No Project alternative, which would have retained the site as it existed in 1987. This alternative would not preclude redevelopment of all or part of the project site in the future, with larger or smaller development than the project as proposed.

Impacts

If this alternative were implemented, none of the impacts associated with the proposed project would occur. In general, the environmental characteristics of the current No Project Alternative would remain as described in the Environmental Setting of this report (see Chapter III, Environmental Setting, pages 44 through 63, for a discussion of the existing conditions).

There would be no effects on historic architectural resources, as the Colombo Building would not be demolished, although this alternative would not preclude demolition of the building for other purposes.

With the No Project Alternative, transportation, noise, and air quality impacts associated with the excavation and construction of the project would not occur. Transportation and air quality conditions (as described in Chapter IV, Environmental Impacts, pages 64 through 105) as base conditions with cumulative development, would continue to exist around the site. Existing potential hazards, such as possible lead in the soils, would remain or be remediated separately from the project. Project excavation would not occur. There would be no potential demolition- or construction-related worker exposure to, or disposal of, hazardous materials, or potential exposure for other persons; nor would there be any remediation, if necessary, of contaminated soils (or groundwater if applicable). Resident population on the site would not increase as it would with the project as proposed. Other impacts including construction noise and air quality effects; wind; increased demand for public services and energy; potential effects on subsurface

Reasons For Rejection

This alternative was rejected by the project sponsors because it would not satisfy the stated project objectives of providing affordable and market rate housing, the Catholic Center, and replacement for St. Mary's School.

Alternative B: Preservation Alternative

Description

Alternative B for this SEIR would be similar to Alternative C for Site B in the 1987 FEIR (pages 166 to 168): the Colombo Building would be retained, an additional floor would be added to the Colombo Building covering 75 percent of the building footprint, and a new seven-story office building would be constructed on the vacant portion of Site B (the FEIR alternative was for an eight-story building, which would have cast shadows on Portsmouth Square, representing a violation of the Shadow Ban Ordinance). The proposed project for Site A (senior housing, elementary school, Catholic Center and parking) would remain in this alternative. This alternative would include a total of approximately 41,000 sq. ft. of office space, 80,000 sq. ft. of residential space (105 units as for the proposed project), 59,000 sq.ft. for school and Catholic Center, 9,500 sq.ft. of retail space, and 156 parking spaces on Site A and 31 spaces on Site B.

Impacts

The primary objective of Alternative B is preservation of the Colombo Building, which may be eligible for listing in the National Register. In order to develop the site and preserve the Colombo Building, the western portion Site B would be developed with a new building. The office space in this alternative would generate a higher number of daily on-site population, a higher level of pedestrian and vehicular activity, and a greater secondary effect in terms of potential growth inducement and employment than the proposed project.

This alternative would generate about 2,160 daily weekday person-trips, of which approximately 130 would occur during the PM peak hour. This would represent a decrease of approximately one percent in daily trips and about a 30 percent decrease in peak hour trip than would be generated by the proposed project for Site B (see Section III.D, Transportation). The PM peak hour trips generated by this alternative (25 vehicle trips) would be about the same as the proposed project (27 vehicle trips). There would be a parking demand of about 39 percent

one percent in daily trips and about a 30 percent decrease in peak hour trip than would be generated by the proposed project for Site B (see Section III.D, Transportation). The PM peak hour trips generated by this alternative (25 vehicle trips) would be about the same as the proposed project (27 vehicle trips). There would be a parking demand of about 39 percent fewer parking spaces (86 vs 140) than the proposed project. Consequently, traffic and air quality effects on local intersections would be about the same for this alternative as the proposed project (the level of service at the studied intersections would be expected to remain at LOS B).

There would be a housing demand of about 14 units generated by office workers. This demand could be accommodated by the existing housing supply in the City. Effects related to geology and hydrology would be less than those of the proposed project because the excavation on Site B would be less than the proposed project. The impact on prehistoric or historic subsurface cultural resources could still occur on the portion of Site B used for the new structure; however, the historic architectural resources of the Colombo Building would be preserved and enhanced as the project would restore the architectural integrity of the structure.

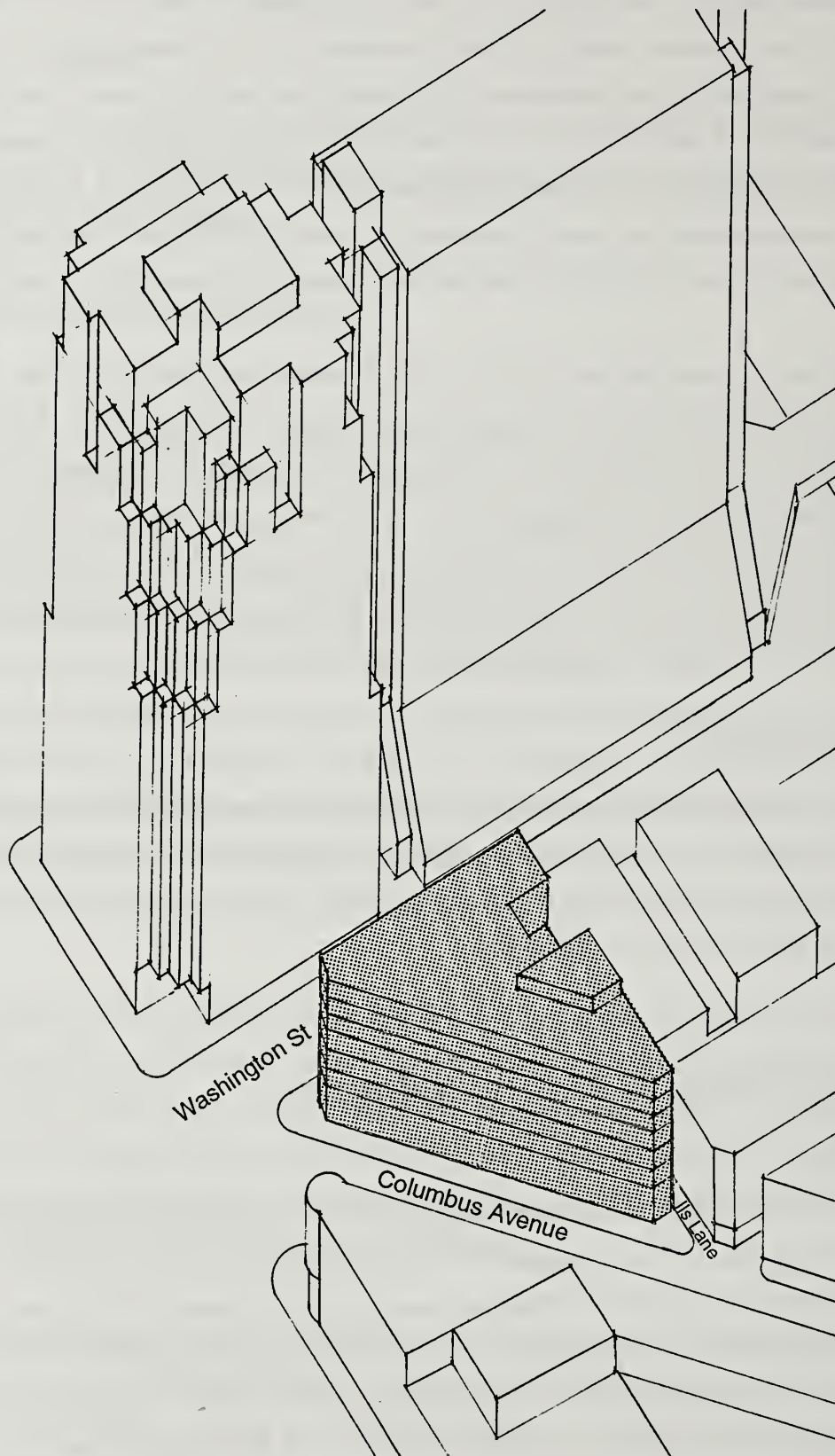
Reasons for Rejection

The project sponsor for Site B rejected this alternative because it would be an underuse of Site B, and the sponsor does not believe the proposed restoration and expansion of the Colombo Building and construction of office space would provide reasonable return on investment which is one of the project sponsors' objectives.

Alternative C: Reduced Housing on Site B Alternative

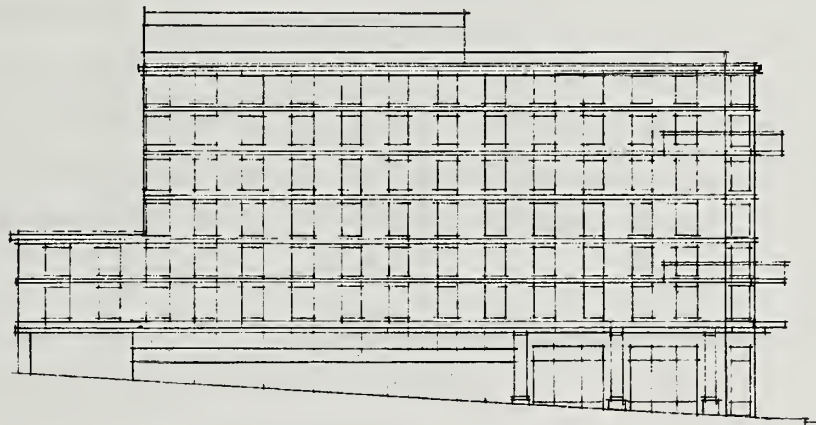
Description

Under Alternative C, Site A would be developed with the same uses as the currently proposed project, and Site B would be developed with less housing than currently proposed. On Site B, this alternative would include 46 market-rate housing units, compared to 70 under the proposed project, and 50 parking spaces located above ground in the second and third levels, compared to 65 under the proposed project. The basement would be used for residential storage. The new building at Site B would be seven stories and 74 ft. in height, compared to 10 stories and 85 ft. in height under the proposed project (see Figures 28, 29 and 30, pages 120 to 122).



Source: James Stephen Titus AIA

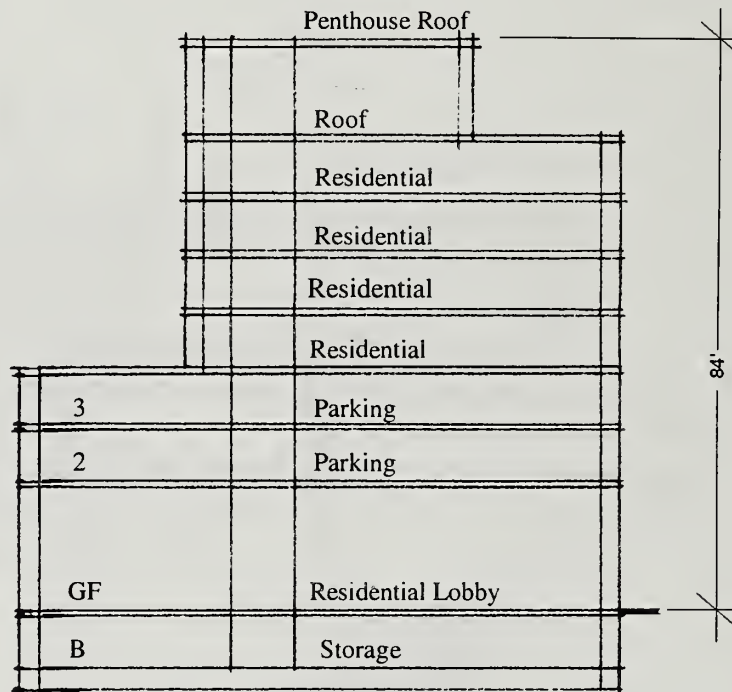
ALTERNATIVE C, AXONOMETRIC FIGURE 28



Washington Street

Source: James Stephen Titus AIA

ALTERNATIVE C, ELEVATION FIGURE 29



Columbus Avenue

Source: James Stephen Titus AIA

ALTERNATIVE C, SECTION FIGURE 30

Impacts

Loss of the Colombo Building would remain a significant impact under this alternative. Other impacts of this alternative would be slightly less than the proposed project as there would be 24 fewer residential units. The urban design, visual quality and shadow impacts under this alternative would be slightly reduced as the building would be 20 feet lower. This alternative would generate about 34 percent fewer overall trips for Site B than the proposed project. Consequently, there would be lower traffic-related air quality impacts.

The impact of demolition of the Colombo Building on historic and cultural resources would remain with this alternative. This alternative would have fewer residents than the proposed project. The effects related to geology and hydrology and potential subsurface cultural resources would be less than those of the proposed project because excavation would be limited to the existing level below grade. There would also be a corresponding reduction in demand for public services and energy.

As the proposed project would not cause significant impacts in any of the areas, this alternative would not reduce any significant environmental effects.

Under Consideration

The project sponsor for Site B is considering this alternative.

Alternative D: Office Uses on Site B Alternative

Description

Under this Alternative, Site A would be developed with the same uses as the currently proposed project, and Site B would be developed with office and retail, rather than housing uses, in accordance with PUD approval in 1987 and current building permit. On Site B, this alternative would include 81,300 sq.ft. of office space, 9,900 sq.ft. of retail space, and 31 parking spaces. This alternative is similar to Alternative G for Site B in the FEIR (pages 172a to 172m), which would have had the same types of uses and building mass on Site B (on Site A, Alternative G would have had 51,900 sq.ft. of residential space [126 market-rate units], 43,300 sq.ft. commercial retail space, and 155 parking spaces). Alternative G was the approved project following certification of the FEIR.

Impacts

From a land use perspective, Alternative D would be a more intense development than the currently proposed market-rate housing project. It would generate a higher level of pedestrian and vehicular activity, have a larger daytime population, and generate a greater secondary effect in terms of growth inducement and employment.

The Colombo Building would be demolished under this alternative which would be a significant environmental effect on historic and cultural resources. The same archaeological impacts would occur and mitigation measures would be necessary.

Alternative D would generate approximately 2,890 daily weekday person-trips for Site B, of which approximately 200 would occur during the PM peak hour. This would represent approximately 30 percent more daily trips and 10 percent more peak hour trip than would be generated by the proposed project for Site B (see Section III.D, Transportation).³ This alternative would generate a total of about 40 PM peak vehicle trips, which would be about 50 percent more than the proposed project.

Under existing-plus-alternative traffic conditions, the additional vehicle activity in the PM peak hour under this alternative would cause slight increases in the average vehicle delays at the seven study intersections. All study intersections, however, would continue to operate at LOS B or better under this alternative, as they would with the proposed project. Under Year 2010 cumulative traffic conditions (including this alternative), LOS B would be maintained at all study intersections except Jackson/Columbus, where traffic flow would degrade to LOS C. This level of service is still considered acceptable.

Under Alternative D, there would be fewer walk trips and more transit trips than would be generated by the proposed project. Approximately 26 more transit trips would be generated by this alternative than the proposed project, which would adversely affect the most heavily used MUNI transit lines in the project area (i.e., 1-California, 9AX-San Bruno 'A' Express, 30-Stockton, 45-Union-Stockton, and 83-Pacific.)

Alternative D would have a peak parking demand from proposed uses on Site B of approximately 138 commercial parking spaces (99 long-term and 39 short-term); however, the alternative proposes 31 valet parking spaces, leaving an unmet demand for 107 parking spaces, which

could be accommodated by public parking proposed at Site A, or by other public parking lots in the study area. However, if parking is unavailable, some vehicle trips could shift to transit trips, thus affecting the transit lines described above as already overcrowded.

Air quality effects associated with on-site uses under this alternative would be slightly higher, approximately ten percent, than the proposed project due to the increase in peak hour vehicle traffic. This increase would not be considered a significantly adverse impact.

Reasons for Rejection

The project sponsor for Site B has tentatively rejected selecting this as the sole possible use of Site B because at the present time such a project is not commercially feasible and it is uncertain when, if ever, market conditions would make such a project feasible on this site. However, the proposed PUD amendment authorizing the residential structure would not prevent the sponsor from proceeding with the previously approved office structure if economic conditions change while the previously issued building permit for the office structure remains in effect.

Alternative E: Smaller Building on Site A Alternative

Under this alternative, Site A would contain about 58 low-income residential units, a religious center and school approximately three-quarters of the size of the proposed project's, and a 154-space parking garage below grade, similar to the proposed project. The above ground uses on Site A would be accommodated in a 65-ft. building with the residential component in a separate wing containing seven floors and the religious center and school in a four-level structure. The senior housing would contain a setback on the sixth floor at the 50-ft level. The religious center/school would contain the same number of classrooms as the proposed project, and a chapel and youth room on the ground floor. There would be no gymnasium, play area, or kitchen facility. Site B would be developed with the same uses as the currently proposed project.

Impacts

Impacts of this alternative would be slightly less than the proposed project as there would be 44 fewer low-income residential units and about 25 percent less institutional space on Site A. The building on Site A would be under the 65-ft. height limit and would not require an exception to the 65-D-2 Height and Bulk District Planning Code restrictions. The building would be

same height as the 900 Kearny Street building to the north of the site on Jackson Street. The visual quality and urban design impacts of the Site A structure would be less than the proposed project's 15-story tower. There would be less of an effect on the scale and urban texture of the project vicinity and shadow impacts would be reduced. The pedestrian-level wind effects of the Site A building would be less than those impacts created by the proposed project along Jackson Street.

The significant impact of demolition of the Colombo Building, an historic architectural resource, would remain under this alternative. The effects related to geology and hydrology and potential subsurface cultural resources would be the same as the proposed project.

Trip generation, parking demand and transit ridership under this alternative would be slightly less than that of the proposed project due to the fewer number of units and less intense use of the religious center and school. Consequently, traffic and air quality effects on local intersections would be correspondingly lower under this alternative. There would also be a reduction in demand for public services and energy consumption.

Reasons for Rejection

The project sponsors for Site A reject this alternative as it would not meet the program objectives of the publicly-funded low-income housing, and the Catholic Center and School.

¹ A discussion of the alternative and its relation to the 1987 City planning Code and the current code is found in a memorandum *Alternatives Not Included in the Supplemental EIR*, August 19, 1996 from Stu During, During Associates to Barbara Sahm, Environmental Review Officer. This memorandum is available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

² Ibid.

³ Information on transportation was based on *Kearny/Columbus Project Transportation Study*, by Korve Engineering, September 1996. This report is on file and available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

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Jerry Robbins, Planner

Mayor's Office of Housing
Joel Lipsky

Others

Department of Housing and Urban Development
Catherine Dymkoski

- California Office of Historic Preservation
- Foundation for San Francisco's Architectural Heritage
- Anne Bloomfield

IX. DRAFT EIR DISTRIBUTION LIST

A. DRAFT EIR DISTRIBUTION LIST

FEDERAL AND STATE AGENCIES

Northwest Information Center
California Archaeological Inventory
Department of Anthropology
Sonoma State University
Rohnert Park, CA 94928
Attn: Christian Gerike

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● X. SUMMARY OF COMMENTS AND RESPONSES

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A. INTRODUCTION

This document contains summaries of the public comments received on the Supplemental Draft Environmental Impact Report (SDEIR) prepared for the proposed Kearny Street/Columbus Avenue project (Case Number 94.615E), and responses to those comments pursuant to California Environmental Quality Act (CEQA) Section 21091 and CEQA Guidelines Section 15088. Also included are staff-initiated text changes and errata.

All substantive comments made at the SDEIR public hearing before the City Planning Commission on October 24, 1996, and all written comments received during the SDEIR public review period from September 20 to November 7, 1996, are presented herein by direct quotation, edited to delete repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and are arranged by topic corresponding to the Table of Contents in the SDEIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross references are provided.

Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision makers.

These comments and responses will be incorporated into the Final SEIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the Final SEIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

David Bahlman, Executive Director, The Foundation for San Francisco's Architectural Heritage (written comments, October 24, 1996).

Anne B. Bloomfield, Architectural History (written comments, October 26, 1996).

Michael Crowe, President, Landmarks Preservation Advisory Board (written comments, October 21, 1996).

Marsha Garland, Executive Director, North Beach Chamber of Commerce (written comments, November 4, 1996).

Joe Luttrell, President, The Telegraph Hill Dwellers (written comments, November 1, 1996).

Harold Moose, President of General Partner of Justice Investors (written comments, October 14, and November 5, 1996; public hearing comments, October 24, 1996).

Gee Gee Platt (Mrs. David Platt), G. Bland Platt Associates, Historic Preservation Consultants (written comments, October 23, 1996).

Vikki-Marie Powers, President, The Victorian Alliance (written comments, October 31, 1996).

Nancy Shanahan, Attorney at Law (written comments, November 7, 1996).

William Stout, William Stout Architectural Books (written comments, October 23, 1996).

Jane Winslow (written comments, October 31, 1996).

C. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

Comment

"The report should include a detailed explanation of the basis for treating what appears to be two separate projects as one under the California Environmental Quality Act (CEQA)." (Michael Crowe, Landmarks Preservation Advisory Board)

Response

The California Environmental Quality Act (CEQA) Guidelines define a "project" under § 15378 as " . . . the whole of an action, which has a potential for resulting in a physical change in the environment, directly or ultimately, and that is an activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies."

As noted in the SDEIR on page 22, the project site consists of four separate lots in the same block, connected by IIs Lane. Although the proposed project would involve the construction of two separate buildings — one on the southeastern corner of the intersection of Kearny and Jackson Streets (Site A), and the other on the northwestern corner of the intersection of Columbus Avenue and Washington and Montgomery Streets (Site B) — it is nonetheless a single "project" as defined by CEQA. The construction of a new building on Site B, either the already approved office/retail building or the proposed market-rate residential/retail building under Project No. 94.615E, is intrinsically linked to the development of low-income housing units on the northern portion of Site A (by allowing the development on Site B to subsidize the affordable housing and reduce the land costs). The proposed project is a single project with a phased development, which could be completed within a period of approximately three years (Site A construction to be completed by the end of 1998 and Site B construction to be completed by 1999). The project approvals requested include an amendment to the

existing 1987 Conditional Use/Planned Unit Development Permit ("CU/PUD") which applies to the overall development on both sites.

Comment

"Reading between the lines, one can discern just two reasons for including Site B in the Project. (1) The addition of it gives enough acreage to qualify for a Planned Unit Development, and (2) on this site the sponsor hopes to make up for potential financial losses on Site A. After all, the two sites are hardly connected; there's no visual relationship between them, and the sponsor even proposes different architects for them. Why include Site B at all?" (Anne B. Bloomfield, Architectural History)

Response

The financial business/policy decision of whether Site B should be considered as part of the project is an issue not required to be analyzed under CEQA. The history of the project site is found in the SDEIR on pages 38 to 40. The City has had a major interest in trying to obtain affordable housing and a community center on Site A. On July 9, 1987, the City Planning Commission approved a project that contained affordable housing, office and retail uses on the Site A and Site B parcels. The subsidized housing on Site A, which is dependent on a below-market value land purchase price, would not be financially feasible without the proposed commercial development of Site B as described in the SDEIR as Alternative D (pages 123 to 125 in the SDEIR). The current project, with subsidized housing and St. Mary's Catholic Center on Site A and market-rate housing on Site B, retains the same economic relationship between the two sites. The Planning Department, therefore, believes that the needs for housing, community center and school can only be met by permitting development of Site B in conjunction with Site A in a manner which would provide sufficient rate of return to the property owner and allow them to sell Site A at a reduced rate.

Comment

"CURRENT BUILDING PERMIT - See pages 39, 43, and 123. While not clear or consistent, the text suggests that there are still valid permits outstanding for Sites A and B. How is this possible? Please explain in detail." (Gee Gee Platt, G. Bland Platt Associates)

Response

As noted in the above response, a Conditional Use Authorization for a Planned Unit Development consisting of affordable housing, office, retail and parking uses on Site A, and office and retail uses on Site B, was approved by the City Planning Commission in 1987. A site permit was issued for Site A, a demolition permit was issued for the removal of the Colombo Building on Site B, and a building permit was issued for a replacement building. However, according to the conditions of the project approval, the demolition of the Colombo Building could not occur until the development of affordable housing on Site A was provided, so the Site B permits could not be implemented until the affordable housing could proceed on Site A. The Site A permit, and as a result, the Site B building and demolition permits, have been extended according to *San Francisco Building Code* provisions during the past five years because the previously approved affordable housing on Site A could not proceed for various reasons not attributable to the project sponsor (the original site permit was issued by the Building Department on May 19, 1988; an alteration to this permit was issued on May 5, 1990, with an expiration date of August 17, 1992. The project owner has extended this permit every six months since August, 1992. The permit history is on file in Project File No. 94.615E for public review at the Planning Department, 1660 Mission Street, Fifth Floor, San Francisco). Therefore, all these permits are still valid. The project sponsors seek an amendment to the previous CU/PUD, in part to obtain the authorization to develop either the approved office building or a similarly sized, mixed retail/residential building proposed in this project. This amendment alone would not change the terms or status of the existing demolition permit.

Comment

"AMENDMENT TO CU/PUD - Page 39. Please explain: ' . . . decided to seek an amendment to the previous CU/PUD to obtain the option of developing a residential project on Site B if economic conditions do not allow for the office building to be constructed.' (Gee Gee Platt, G. Bland Platt Associates)

Response

There are valid CU/PUD authorization, building permits and demolition permit for the project sites to provide affordable housing on Site A and commercial office space on Site B, as noted in the above responses. The project sponsors are applying to the City for changes in the project on Site A (the inclusion of a school and St. Mary's Catholic

Center), as well as permission to have the option to develop Site B with market-rate housing and ground floor retail uses as an additional option to implementing the existing permits for office and retail uses. The current property owner, Pan Magna, believes that it is necessary to have this option in order to ensure that an economically viable project is possible on Site B. This, in turn, allows Site A to be sold at below-market value to allow the development of affordable housing and St. Mary's Catholic Center on it. At present, the demand for commercial office space in downtown San Francisco may not support an office development on Site B, and Pan Magna believes that market-rate housing may provide a more economically viable option for development.

Comment

"As you know, Heritage's history with this project has been long standing. It has been 8 years since Heritage signed a Settlement Agreement with Four Seas Investment Corporation, withdrawing Heritage's appeal of the project on file with the Board of Permit Appeals. The Heritage Board of Directors believed that the greater long-term benefit for San Francisco would be achieved if the growing conflict between historic preservation and low-income housing construction could be permanently defused.

"Heritage felt that in a community in which too many issues are resolved by adversarial court battles, more constructive means of reconciling conflicting objectives were needed. The negotiation which took place with Four Seas and the City resulted in written policies under which the Mayor's Office of Housing agreed to consult with the City's Landmarks Board at the earliest stages of any development that involved historic structures.

"In exchange, Heritage agreed not to oppose demolition of the Colombo Building, under the terms of the Conditional Use Permit issued to Four Seas Investment Corporation.

"It is our opinion that the current project differs substantially from the Four Seas Investment Corporation plan and will require a significantly different Conditional Use Permit, as the current project envisions a 10-story market-rate housing structure instead of an 8-story office building." (David Bahlman, The Foundation for San Francisco's Architectural Heritage)

Response

The Settlement Agreement between the Four Seas Investment Corporation and The Foundation for San Francisco's Architectural Heritage is not an environmental issue that requires consideration under CEQA. The current project is an application to modify a

previously granted Conditional Use Authorization for the use of both Site A and Site B. A comparison of the primary characteristics of the previously approved project and the proposed project can be found in Table 1 on page 38 of the SDEIR. Physical environmental differences between the projects are the basis for the SDEIR's analysis and conclusions concerning environmental impacts.

LAND USE AND ZONING

Comments

"Use. At present, there will be no retail space provided on Site A. The original site with the International Hotel had a wonderful array of mixed uses: restaurants, barber shop, music club, retail and a SRO hotel. It created an activity all during the day and evening. Kearny Street between Jackson and Washington is a major pedestrian link between the Financial District and North Beach and the Waterfront. Retail uses should be included in this proposal to enhance street activities, because they currently make up the character of the existing neighborhood and were a part of the International Hotel site. This is a wonderful opportunity to bring back the retail neighborhood character lost for so many years." (William Stout, William Stout Architectural Books)

"- The street level of the building does not include retail at all on Kearny or Pacific [Jackson]. Small retail on the ground floor is desirable in order to add life to those blocks of Kearny and Pacific [Jackson]." (Jane Winslow)

Response

The commenters are expressing their personal opinion on their preference for inclusion of certain land uses in the project. The comments do not raise environmental issues, but the concern regarding land uses may be raised as issues for the Conditional Use Authorization consideration by the City Planning Commission. The SDEIR discusses land uses of the project and the adjacent area on pages 44 to 48 and 64 to 65. The community center and school uses on Site A preclude the option for retail space, but the amount of retail space on Site B would increase with the proposed project. The Findings for the Planned Unit Development (CU/PUD) project application will address the mix of uses from a planning perspective.

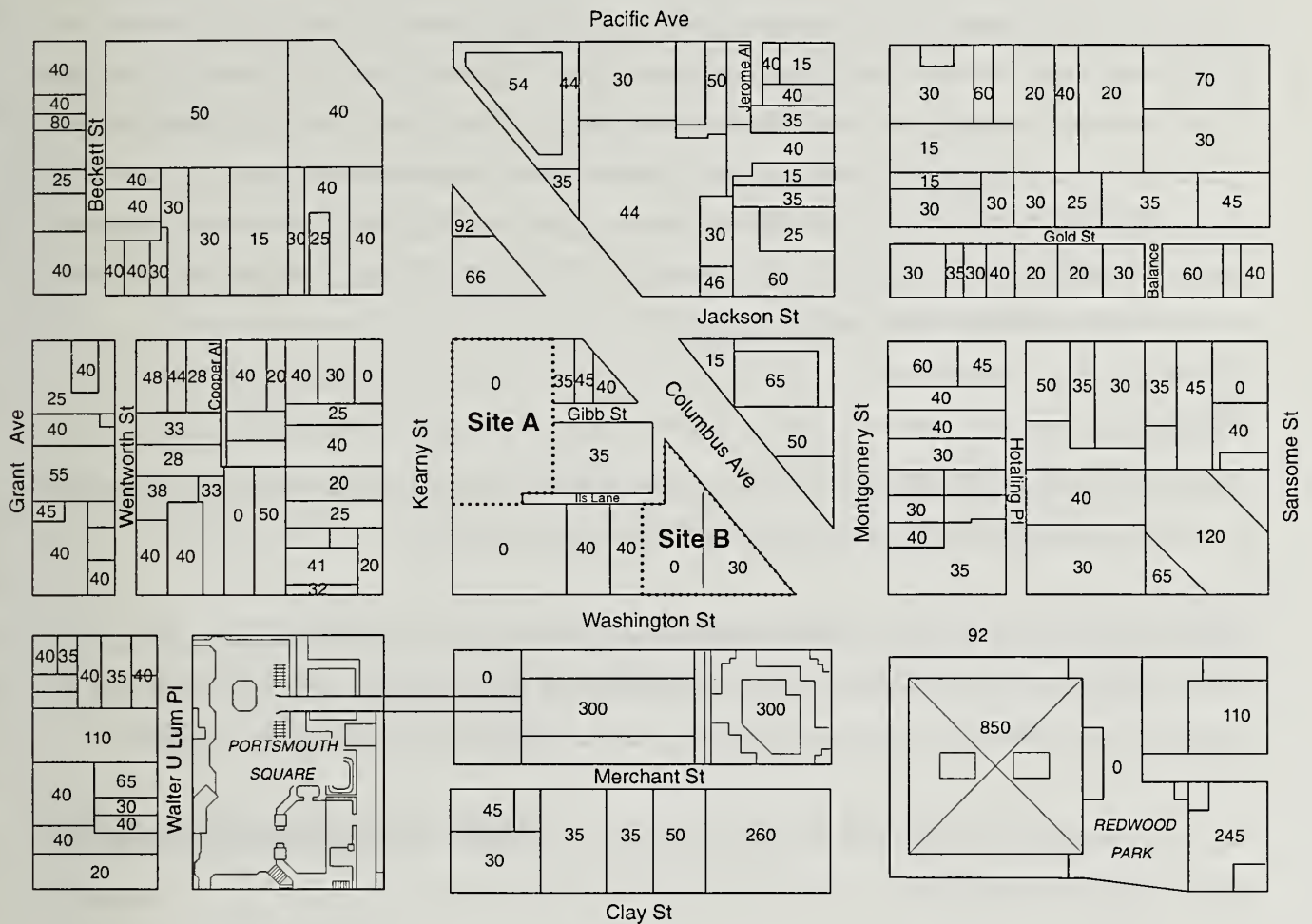
Comment

"ENVIRONMENTAL SETTING (page 44): What are the approximate heights of existing buildings in the various areas cited? Inclusion of a map showing these would be helpful here. Page 47 - Please explain: 'While the design of the proposed project was changed, the analysis of the relationship to this policy remains accurate.' How? Why?" (Gee Gee Platt, G. Bland Platt Associates)

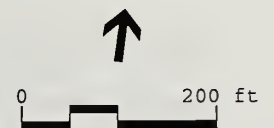
Response

On page 49 of the SDEIR, reference is made to Figure 17A, "Building Heights in Project Vicinity" in the 1987 Final EIR (FEIR). This figure has been revised with current building height information (four sites have either new buildings or buildings have been demolished) and is shown as Figure C&R 1 on page C&R.11. The proposed Site A housing building would be about 140 feet in height (excluding elevator penthouse and the trellis) and the St. Mary's Catholic Center would be about 65 feet in height; the proposed Site B building would be about 94 feet in height. The Holiday Inn and the Washington/Montgomery Building on the south side of Washington Street are 300 feet in height. The buildings on the west side of Kearny Street across from project Site A range from 25 to 40 feet in height. The two buildings immediately to the north of project Site A on Jackson Street, 900 Kearny Street and the Columbus Tower Building, are 66 feet and 92 feet in height, respectively. The building heights on the east side of Columbus Avenue, across from project Site B, range in height from 15 feet to 65 feet.

On page 47 of the SDEIR, Policy 1 of Objective 2 (referred to in the FEIR as Policy 2 of Objective 4) states, "promote a building form that harmonizes with the scale of existing buildings and width of Chinatown's streets." The discussion on page 42a of the FEIR references the supporting text for that Policy which includes recommended urban guidelines, such as maximum widths along street frontages of 50 feet to 75 feet for buildings over 40 feet in height. Where project buildings would be more than 50 feet in width along the street, street frontages should be divided by architectural treatment(s) to appear as independent buildings.



IN FEET ROUNDED TO THE NEAREST FIVE FEET



SOURCE: ESA

BUILDING HEIGHTS IN THE PROJECT VICINITY C&R FIGURE 1

The project frontage along Kearny Street would be about 175 feet wide (Site A); the project frontage along Columbus Avenue would be about 216 feet wide (Site B). The buildings in the original project described in the FEIR would incorporate design features such as architectural base elements and setbacks intended to reduce the appearance of bulk. The proposed project buildings would also incorporate design features to reduce the appearance of bulk. In both the original project buildings and the currently proposed buildings, the structures would exceed the 50-foot and 75-foot frontage widths along Kearny Street and Columbus Avenue.

Comment

"I am concerned about the impact of both Sites A and B of the above project on the Columbus Avenue streetscape and views of Coit Tower and Telegraph Hill.

"Both components of this project far exceed the height limit and overwhelm the surrounding area. If such generous concessions are given then more will be asked for. The very thing that we thought the 40-foot height limit was going to prevent happening is beginning to happen.

"Site B's proposal will dwarf and demean the gracious landmark building across the street - the old Transamerica Building.

"It was my understanding that there was to have been a 40-foot height limit along the Columbus Avenue corridor. Now I hear that that is not the case and I am most surprised. When was this change brought about?

"Despite our high regard for the project sponsor, the Chinese Community Housing Corporation, this organization is concerned about the impact of both Sites A and B of the above project on the Columbus Avenue Streetscape.

"Both components of this project exceed the height limit and overwhelm the surrounding area, thereby threatening the village-like quality of North Beach." (Marsha Garland, North Beach Chamber of Commerce)

Response

Page 48 of the SDEIR describes the zoning districts of the proposed project. Both Site A and Site B are in the 65-D-2 Height and Bulk District, which allows the City Planning Commission to authorize height exceptions up to 200 feet. This district extends one-half block north of Washington Street (into the Jackson Square Historic District) from Kearny Street to Battery Street (in the project block it extends to Kearny and Jackson Streets). Thus, the project would conform to the existing zoning. The previously approved project described in the FEIR had a height of 165 feet on Site A (about 25 feet higher than the proposed project) and about 94 feet on Site B (about the same height as the proposed project). The basic height limit west of the project site on Kearny Street and along the east and west sides of Columbus Avenue north of the project site is 65 feet. The zoning controls for height along Columbus Avenue have been in effect for over ten years.

The commenter's concerns about the proposed project's effects on the North Beach community are noted and will be considered by the City Planning Commission as it weighs the merits of the project.

URBAN DESIGN AND SITE VISIBILITYComment

"Size, height and compatibility with the existing neighborhood. The proposed residential tower is 165 feet 16 stories including the roof deck. Excluding the tall buildings on Washington [Street] which I had always assumed was the northern boundary of the Financial District, no buildings over 65 feet have been built in the immediate two-block area since the International Hotel was evacuated. The proposed building with its 165-foot wall on Jackson is approximately 10 stories or 100 feet taller than the bank building across the street. It overwhelms it and the neighborhood. As seen in the shadow diagrams, Jackson Street between Kearny and Columbus and Columbus between Pacific and Jackson will be in shadow much of the day causing the local restaurants that have outside service a loss of business. The sidewalk and the entry to the . . . San Joaquin Hotel also would be in shade. Along with Cornucopia, this is a gathering place for the residents of this SRO hotel. This hotel still provides housing for residents similar to those

that inhabited the International Hotel. It would be a shame to eliminate what street life now exists. It has always been my understanding that the new buildings built in this area should fit in character with the existing structures in the immediate area. In my opinion, the residential component of this building doesn't fit." (William Stout, William Stout Architectural Books)

Response

The height of the proposed building on Site A is shown in Figure 3, page 25 in the SDEIR. The structure would be about 140 feet in height on Jackson Street, with the elevator penthouse and trellis set back from the facade. The St. Mary's Catholic Center and the senior housing tower have been designed to break the Kearny Street facade into separate masses to avoid the sense of a continuous wall. Entrances have been placed along Kearny Street to promote street activity through opportunities to enter the project components. The 900 Kearny Street building across Jackson Street is about 66 feet in height. The facade of the senior housing tower facing on Jackson Street is broken at lower levels by the base which extends about 50 feet from the Kearny/Jackson corner. To the east of the base are the automobile and pedestrian entrances to the parking garage which would provide a different expression for the bottom of the tower. The upper portion is articulated with bay windows which would reduce the overall massing of the Jackson Street facade. A community center would be at the corner of Kearny and Jackson Streets.

The project shadow patterns shown in Figures 22, 23, 24 and 25 in the SDEIR (pages 72 and 74 to 76) have been slightly revised and are shown in the Errata chapter on pages C&R.75 to C&R.78. The two retail/restaurant establishments adjacent to the project site (on Jackson Street) would be in shadows cast either by the buildings in which they are located or by other non-project buildings at 12:00 noon on March 21, September 21 or December 21. There would be no shadows in front of the retail/restaurant spaces at 12:00 noon June 21. There are two restaurants with outdoor seating on Columbus Avenue, near the project: Sophies (formerly, Clown Alley) and Macaroni. The project would not cast new shadows on either of these two locations at the times studied in the shadow diagrams (one minor exception is on December 21 at 3:00 p.m., the project would cast a shadow at the northwest corner of the Sophies lot). The project would cast

some shadows near the entryway of the Cornucopia and San Joaquin Hotels at 3:00 p.m. on March 21, September 21, and December 21. There would be no new shadows at these locations at 9:00 a.m. and 12 noon on March 21, June 21, September 21 and December 21, or at 3:00 p.m. on June 21.

The SDEIR finds the proposed project would be compatible with surrounding land uses, and would increase pedestrian activity in the project area. The commenter's remarks regarding urban design characteristics of the project are noted and will be considered by the City Planning Commission as part of the information on which it will base its decision on the project.

Comment

"Even in its present state, the Colombo Building has the wonderful service mix that should be included in Site A: barber shop (barber plays clarinet when not busy), laundry, restaurant, office supply, newspaper office on the first floor. The second floor offices with its use of rich materials in the public spaces probably cannot be matched in a new building because of today's economics. Its exterior architectural character works harmoniously with the Old Transamerica Building across the street. The building has been in transition for as many as 15 years and has much of the character we strive for in establishing an urban fabric. The diagrams shown on pages 32 and 33 don't seem to relate to the classic architectural [character] of the Old Transamerica Building. In size, they overpower the Transamerica Building and put it in shadow much of the afternoon. A smaller building that doesn't dominate the corner should be considered while integrating the existing Colombo Building in its scheme. The rounded, articulated corners used both on the Colombo and Transamerica buildings should set a precedent. The existing Colombo Building's fenestration seems much more in character with what should be built than the diagrams included in this report (see photo page 50)." (William Stout, William Stout Architectural Books)

Response

As noted above, the Site B building would contain about 9,900 sq.ft. of ground floor retail space. The specific mix of retail uses has not been determined, nor is it an

environmental issue which is required to be analyzed pursuant to CEQA. The diagrams on pages 32 and 33 in the SDEIR are only rough schematic representations of building massing. Of the twelve times shadow calculations were made, the shadow diagrams on pages C&R.75 to C&R.78 show that the project would cast shadows on the Fugazi/Transamerica Building only at 3:00 p.m. on December 21.

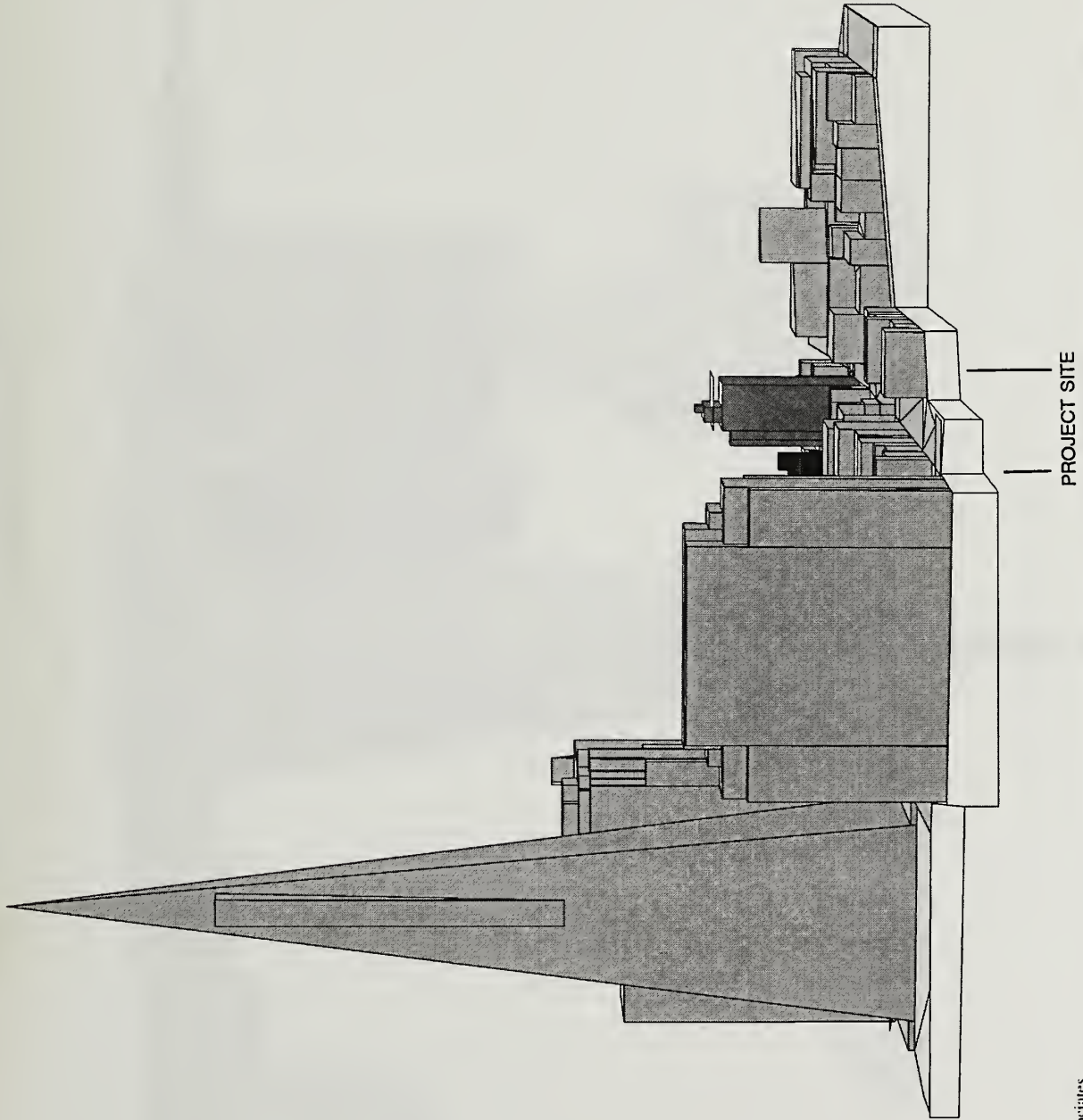
The commenter's remarks are noted and will be considered by the City Planning Commission as part of the information on which it will base its decision on the project.

Comment

"URBAN DESIGN/SITE VISIBILITY - Summary (page 7 - paragraph 1). Please explain the last sentence: 'The project would step down in height from the Financial District, providing a transition in the scale' Would additional photographs assist the reader?" (Gee Gee Platt, G. Bland Platt Associates)

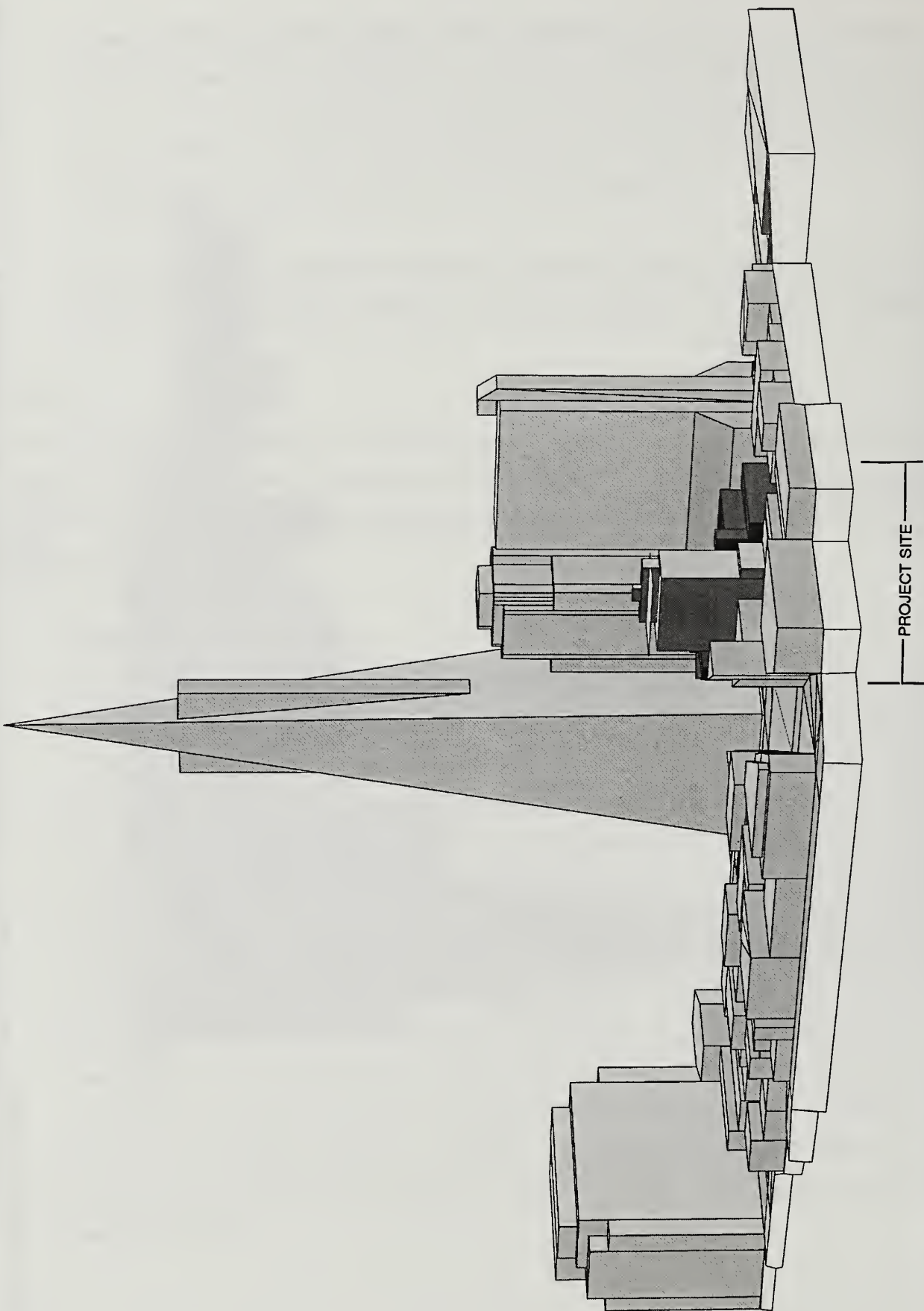
Response

The southern frontage of Site B (on Washington Street) would rise approximately 100 feet in height. The Holiday Inn and the Washington/Montgomery towers (on the south side of Washington Street) are both about 300 feet in height. The Financial District to the south of the site contains many buildings over 300 feet in height. Diagonally from Site B (on the southeast corner of Washington and Montgomery Streets) is the 850-foot-tall Transamerica Pyramid. To the east of the site is the 218-foot-tall Appraiser's Building on Sansome Street on the eastern border of the Jackson Square Historic District. North of Site A is the 66-foot-tall 900 Kearny Street building and the 92-foot-tall Columbus Towers Building. Figures C&R 2, 3 and 4 (pages C&R.17, 18, and 19) are axonometric representations showing the project area (including the proposed buildings) from the east, west and north perspectives. These figures show the size of the project buildings compared to the height and bulk of the buildings in the surrounding area. These figures are intended to provide a general perspective on how the project would relate with its surroundings and do not necessarily show how the project would appear from any particular location.



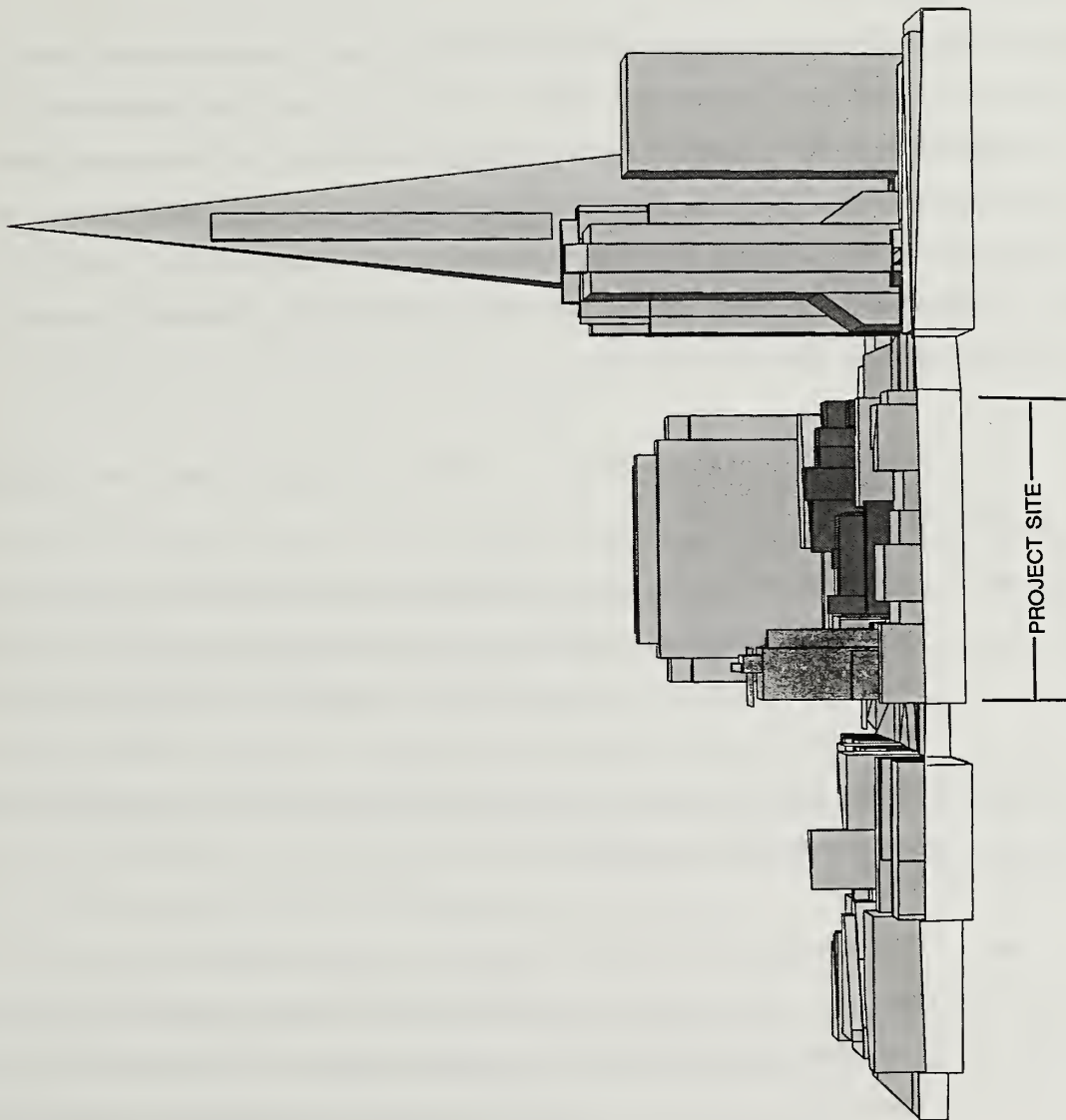
SOURCE: Environmental Science Associates

AXONOMETRIC OF PROJECT AREA LOOKING WEST C&R FIGURE 2



SOURCE: Environmental Science Associates

AXONOMETRIC OF PROJECT AREA LOOKING SOUTH C & R FIGURE 3



SOURCE: Environmental Science Associates

AXONOMETRIC OF PROJECT AREA LOOKING EAST C&R FIGURE 4

Comment

"COMPATIBILITY OF PROPOSED DESIGNS WITH SURROUNDING BUILDINGS. Please explain why the proposed designs are considered compatible with surrounding existing buildings. Does each pick up design elements from the adjacent neighborhoods? If so, what are these? If not, why not?" (Gee Gee Platt, G. Bland Platt Associates)

Response

The SDEIR states on page 66 that the project would alter the scale, facade rhythm, and urban texture of the project block and its vicinity. The project would represent a departure in form and scale from existing development on the project block, but would also provide a transition from the newer highrise and mid-rise structures located mainly south of the block. Beyond such statements of fact, urban design is a relatively subjective issue and will be addressed by the City Planning Commission when it considers project approval.

The project sponsors intend to design the project with the following design characteristics:

- The massing of the Site A building would be divided into several major design elements. Major variations would exist through the planes of the exterior wall surfaces to create individual facade segments, in keeping with Policy 1 of Objective 2 of the Chinatown Area Plan. The use of different facade materials (brick, glazed areas, bay windows) would also produce discrete elements within each major facade segment.
- The housing tower street frontage along Kearny Street would be about 44½-feet wide. An 18½-foot-wide stairway would separate the St. Mary's Catholic Center from the residential tower. The height of the base element at approximately 60 feet (plus a three foot \pm parapet) would be similar to the prevailing height of the low-rise buildings near the project. The use of a brick facade with punched openings would be characteristic of the older buildings in Chinatown, along Columbus Avenue and the Jackson Square area.

- The residential tower, at approximately 140 feet in height, would be shorter than the buildings in the Financial District to the south and southeast, lower in height than the 218-foot-tall Appraiser's Building to the east, but taller than the Columbus tower at Kearny Street and Pacific and Columbus Avenues.
- The building design on Site B would also include design features to separate the facade into three elements (base, mid-range and different roof types) in order to reflect the height and design of buildings in the Jackson Square Historic District. The base element would be the same height as the Transamerica Building (to the east of the project site) in order to preserve the sense of "gateway" to the North Beach area of the City. A horizontal band would be of similar proportions as the band on the Transamerica Building and the height of the windows would also be similar. The mid-range element and the roof types would break up the building facade in order to reduce the bulk above the base. The color and texture of the facade elements would reflect the same patterns of the surrounding historic area.

Comments

"During the past few days, several of our members, including three past-presidents, have expressed to me concerns which they have about the proposed Kearny Street/Columbus Avenue Project. These are concerns which appear to be substantial, which are shared by our executive committee, and which we wish to bring to your attention.

"The concerns pertain to the central aspects of the project namely its height, bulk and density, and the absence of retail space, undermining precepts which have governed development in the neighborhood, in North Beach, and on Telegraph Hill for decades.

"What we request is the opportunity to discuss our concerns with you and all other parties involved in the project; it is our hope that we may work out solutions satisfactory to everyone."
(Joe Luttrell, President, Telegraph Hill Dwellers)

"This is to briefly register my concerns regarding the proposed project for this site related to height, use, bulk and density.

"- A 165-foot tower, which is 100 feet over the height limit, is too high.

"- It is difficult to argue against the need for affordable senior housing anyplace in the city, and it is especially needed in the Chinatown/North Beach area. It is also difficult to argue against a school and church. However, both of them combined as they are here creates too much density and bulk in an area that is less than 1/2 of a square block in size!

"Hopefully, the resulting project will be changed to meet both the needs of the project sponsors and the land use concerns of the surrounding neighbors in North Beach and the surrounding hills." (Jane Winslow)

Response

As noted above, the project is in a 65-D-2 Height and Bulk district, which allows height exceptions up to 200 feet. The proposed massing of buildings on the project site (including building heights of 140 feet for the Site A and 94 feet for Site B) would be permitted under the *San Francisco Planning Code*. The commenters' concern about the height, bulk and density of the project are noted and will be considered by the City Planning Commission as part of the information on which it will base its decision on the project.

The proposed project would include 9,900 sq.ft. of ground floor retail space on Site B, an increase of about 3,350 sq.ft. above current retail space on the project site.

HISTORIC, ARCHITECTURAL, AND CULTURAL RESOURCES

PROJECT EVALUATION

Comments

"The report should provide an analysis of the previous landmark initiation and its legal standing given the fact that the City Planning Commission failed to hold a public hearing and take a formal action on the proposal." (Michael Crowe, Landmarks Preservation Advisory Board)

"Further, the SDEIR does not inform the public and decision makers of the prior initiation of the City's landmark designation process and its legal status in light of the fact that the City Planning

Commission has not yet held a public hearing or taken any formal action on the proposal."
(Nancy Shanahan, Attorney at Law)

Response

On page 51 of the SDEIR, reference is made to the Landmarks Preservation Advisory Board's recommendation in May 1984 for City landmark status for the Colombo Building. The SDEIR states accurately that no formal designation by the City has taken place. The City Planning Commission continued indefinitely its consideration on the Landmark designation of the Colombo Building in June 1984, and the Board of Supervisors did not receive any information on the proposed designation. Under Sections 1004, 1004.1, 1004.3 and 1004.4 of the *San Francisco Planning Code*, designation of a City landmark shall be by ordinance after a public hearing, which ordinance shall incorporate the findings of the City Planning Commission resolution in the file of the Clerk of Board of Supervisors. In the case of the Colombo Building nomination, a public hearing was never conducted by the Commission or the Board. Under Section 1014, "Applicability," if 180 days have elapsed without action from the date of an application to initiate designation of a landmark, a permit application may be approved. Thus, with the elapse of the previous landmark initiation, the demolition and building permits for Site B are still valid.

Comment

"HISTORIC AND ARCHITECTURAL RESOURCES - See Summary (page 8); Environmental Setting (pages 51 and 52). Consistency and verification are needed in discussing Heritage's B* rating. Also, is this a B* or B+? Is this the appropriate place to refer the reader to Appendix A? There appears to be no such note now." (Gee Gee Platt, G. Bland Platt Associates)

Response

On page 8 and on page 51 of the SDEIR, the rating of "B*" by Heritage Foundation for the Colombo Building is noted. Footnote 1 under "Historic/Architectural Resources" on page 51 in the SDEIR states that the Colombo Building was rated B* by Heritage in its extended survey. The B* rating was given to the Colombo Building because of the alterations to the structure which affect its integrity; B* means if these alterations were reversed or removed, the building would be rated "A" by Heritage. There is no discussion

of a B+ rating in the SDEIR, nor is it a rating given in the building's evaluation by Heritage.

The following sentence is added to the end of the first paragraph under "Historic/ Architectural Resources":

Chapter X, Appendix A, pages A.1 to A.3, details the rating system used by the 1976 DCP inventory.

Comment

"These sections are sparse with respect to the architectural and historic significance of the Colombo Building. More information is available in the various reports mentioned below, and in previous surveys and cultural resource studies and documents." (Gee Gee Platt, G. Bland Platt Associates)

Response

The commenter is correct in noting that information on the architectural and historic significance of the Colombo Building is available in more detail in the various reports, surveys and studies cited in the SDEIR. The FEIR for the previously approved project discusses the architectural and historic significance of the Colombo building on pages 53, 53a, and 55 and the SDEIR references the FEIR and provides additional information on the Colombo Building on pages 51 and 52. The *Kearny Street/Columbus Avenue Project, Historic Resources Study*, by Page & Turnbull, Inc., dated August 28, 1996, was specifically prepared for the SDEIR and is part of the administrative record and available for public review at the Planning Department. The salient aspects of the architectural and historic significance of the Colombo Building are identified and all major studies on the Colombo Building are referenced in the SDEIR and the Page & Turnbull report. An additional document concerning the architectural and historic significance of the Colombo Building is the Final Case Report adopted by the Landmarks Preservation Advisory Board on November 6, 1996, which gave the Colombo Building a "C+ +" rating. The Case Report is available for public review at the Planning Department. The historic architect consultants reviewed the document and determined that it does not affect their conclusion regarding the evaluation of the Colombo Building.

Comment

"The Draft SEIR calls the proposed demolition of the Columbo [sic] Building a 'potential unavoidable significant adverse impact on the environment.' I submit that this impact would be actual rather than merely potential. The word 'potential' is apparently used because of the 14-year-old rating by the State Historic Preservation Office (SHPO). However, the CEQA requirement concerning historic resources is for any building that appears eligible for the California Register of Historic Places, whether or not it has been previously identified as eligible." (Anne B. Bloomfield, Architectural History)

Response

It has been the practice of the San Francisco Planning Department to identify environmental effects of a proposed project in the conditional tense until the actual project proposal is approved by the City Planning Commission. Thus, all environmental impact reports determine "potential" environmental effects rather than actual as the respective projects are in the proposal stage and have not been approved or implemented. In the case of the Colombo Building, the proposed amendment of the Conditional Use/Planned Unit Development has yet to be authorized by the City Planning Commission. Demolition, in fact, has not yet occurred and there are still conditions under the original project approval that have to be met (such as the construction of affordable housing on Site A) before the demolition would be allowed. In addition, the SEIR Certification motion would state that the demolition would be an unavoidable significant environmental impact.

Comment

"IMPACTS - page 80 - paragraph 3. This discussion is not objective. Please return to Historic Preservation Consultant's report and re-write, perhaps quoting from [the] report." (Gee Gee Platt, G. Bland Platt Associates)

Response

The City believes that the analysis is objective and accurate. The discussion regarding the proposed project's potential impacts on the historical and architectural resources on page 80 of the SDEIR is based on the *Kearny Street/Columbus Avenue Project*,

Resources Study, prepared by Page & Turnbull, Inc., August 28, 1996, as noted in the footnote at the beginning of the section. The section is consistent with the report. The authors of the report reviewed and concurred with the impact analysis on page 80. The commenter's opinion regarding the objectivity of this section is noted and will be considered by the City Planning Commission as part of the information on which it will base its decision on the project.

Comment

"GENERAL COMMENTS - There appear to be at least three reports dealing with architectural and archaeological matters: Page & Turnbull; Archeotec; and Treadwell and Rollo. These do not seem to have been integrated into the appropriate sections of the present DEIR. For example, the Treadwell and Rollo report is only referenced under HYDROLOGY. Information from each of these should be culled and inserted also into the Architectural and Archaeological [sections] to present a more complete overall assessment." (Gee Gee Platt, G. Bland Platt Associates)

Response

The commenter is accurate in noting that various technical studies on the proposed project address a number of environmental areas of inquiry. For example, the potential effects of vehicle trips generated by the project could change the traffic level at selected intersections, as well as local air quality; therefore, traffic analysis is also used in the air quality discussion. EIRs by definition are comprehensive studies where environmental issues frequently overlap. There were three reports dealing specifically with archaeological resources at the project site: *Cultural Resources Evaluation: Pan Magna Development Project, San Francisco, California*, June 1996; *Pan Magna Plaza: Preconstruction Archaeological Testing Program, San Francisco, California*, December 1987; and *Archaeological Data Recovery Program Conducted Within Site A of the Kearny/Columbus Site, San Francisco, California*, February 1996. All were prepared by Allen Pastron, Ph.D., consulting archaeologist for the FEIR. These reports are available for public review at the Planning Department, 1660 Mission Street, San Francisco. The Page & Turnbull report cited in the above response addresses the historic architectural issues on Site B. The Treadwell & Rollo reports are site assessments focused on the presence of hazardous materials on the site and do not specifically address archaeological and architectural matters. The City believes that the SDEIR provides an

City believes that the SDEIR provides an adequate, thorough and comprehensive assessment of the architectural and archaeological resources of the project site and that further special studies are not warranted. The concern of the commenter regarding the integration of information is noted.

Comment

"Did above report writers consult and incorporate information contained in the Landmarks Board's Case Reports, and in other existing cultural resource surveys and studies? If so, it is not apparent." (Gee Gee Platt, G. Bland Platt Associates)

Response

Page & Turnbull did have available and did consult the Case Report prepared for the Landmarks Preservation Advisory Board in December, 1982 by Jean Kortum and Jonathan Malone. In addition, the research file of The Foundation for San Francisco's Architectural Heritage was available to Page & Turnbull, and the State of California Historic Resources Inventory forms prepared by Anne Bloomfield in June, 1982 as part of the North Beach Historical Project, were consulted. Treadwell & Rollo and Allan Pastron did not consult the information in the Landmarks Board's Case Reports, since these background studies and analyses focused specifically on archaeological and hazardous wastes on the site, rather than historic architectural resources. The commenter's concern that the information in the Case Reports and in other existing cultural resources surveys and studies was not used in the analyses in the SDEIR is noted.

Comment

"Although the Colombo Building isn't a building that deserves to be a National Landmark, it should be saved if for nothing more than for the history and memory it brings to this area. It's a classic example of the wonderful mix of Italian and Asian cultures. It is a true transition building itself, over the years serving both Italian and Asian businesses in one location with wonderful harmony." (William Stout, William Stout Architectural Books)

Response

The SDEIR identifies the loss of the Colombo Building as a potentially significant environmental effect. The opinion of the commenter is noted.

NATIONAL REGISTER ELIGIBILITY

Comments

"The Supplemental Draft EIR establishes the National Register eligibility of the Colombo Building, but a detailed analysis of how the building rates under National Register criteria should be included." (David Bahlman, The Foundation for San Francisco's Architectural Heritage)

"The study cites the National Register eligibility of the Colombo Building but does not provide an analysis of how the resource rates under the four National Register criteria." (Michael Crowe, Landmarks Preservation Advisory Board)

"NATIONAL REGISTER OF HISTORIC PLACES - See Summary (pages 8 and 17); Environmental Setting (pages 51-52); Environmental Impacts (page 80); Page and Turnbull Report. Discussions are incomplete and lack consistency from section to section. What qualities does the Colombo Building possess that make it potentially eligible for the National Register? Under what circumstances would the building be included in the National Register? Has sufficient information now been assembled to make such a determination?" (Gee Gee Platt, G. Bland Platt Associates)

"In my professional opinion, with additional historic research in hand, I find that the Colombo Building does indeed appear eligible for the National and California Registers of Historic Places, at the local level of significance, under Criterion B, persons, for its association with the woman financier Elise Drexler; and under Criterion C, architecture, because it possesses high artistic values in its urban design as the gateway (with the Fugazi Bank/Old Transamerica Building opposite) between North Beach and the financial district, and because it is the work of a master architectural firm, the Reid Brothers, who here were sensitively responding to the location." (Anne B. Bloomfield, Architectural History)

"In particular, although the SDEIR mentions that the Columbo [sic] building is eligible for National Register listing, it fails to provide any analysis of the [sic] how the building rates under National Register criteria." (Nancy Shanahan, Attorney at Law)

Response

The SDEIR states on page 1 that one of the primary reasons the document was prepared relates to a 1992 revision to CEQA. This revision established a presumption that demolition or substantial change in an historic resource is a significant environmental effect, requiring preparation of an EIR, and including a definition of an historic resource as one listed in or determined eligible for the California Register of Historic Places. The Colombo Building has been evaluated by the State Office of Historic Preservation (SHPO), and SHPO has determined that the building has characteristics that may make it eligible for a separate listing in the National Register of Historic Places. The National Register eligibility of the Colombo Building was not addressed in the SDEIR and by the authors of the Page & Turnbull report because SHPO had already confirmed a rating of the building and the SDEIR states that the demolition would be a significant environmental effect.

There was little supporting material in the SHPO files supporting the rating. The following discussion, prepared by the historic architecture consultants, is a brief analysis of National Register eligibility. It provides additional detail which is consistent with and supplements the existing discussion in the SDEIR regarding the National Register.

Properties can be eligible for the National Register of Historic Places if they qualify under one or more of the following criteria:

- Criterion A: Event. Properties can be eligible if they are associated with events that have made a significant contribution to the broad patterns of our history.
- Criterion B: Person. Properties can be eligible if they are associated with the lives of persons significant in our past.
- Criterion C: Design/Construction. Properties can be eligible if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

- Criterion D: Information Potential. Properties may be eligible if they have yielded, or may be likely to yield, information important in prehistory or history.

Properties may be locally, regionally, or nationally significant under one or more of the above criteria. In addition, they must possess sufficient integrity to be able to convey their significance.

Criterion A and D clearly do not apply in this case. Comments on the SDEIR suggest that the Colombo Building may be eligible under Criterion B or C.

Criterion B: Person

It is generally more difficult to show that a building is significant through its association with a prominent person than to show that it is significant for its architectural qualities under Criterion C.

First, the person or persons associated with the building must be "*individually significant within a historic context.*"¹ Second, the property associated with the prominent person must be associated with that person's productive life. Third, "each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions."²

It is the argument of the October 1996 Draft Case Report prepared for the LPAB after publication of the SDEIR that Elise Abigail Drexler is individually "significant in women's history as a financier."³ While additional research might show that Elise Drexler, aside from appearing in city directories as "capitalist" or "investor,"⁴ was recognized in financial circles at her time, and in the history of finance since then, as having special prominence as an owner of real estate or as a developer, it would still be necessary to show that, of properties she owned, her special significance in the world of real estate was particularly exemplified by and bound up with the Colombo Building, as distinguished from her other properties. The historic architecture consultants have determined that these detailed associations are not supported by existing research results.

Criterion C: Design/Construction

To be eligible under Criterion C, a property must meet at least one of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction;
- Represent the work of a master;
- Possess high artistic value;
- Represent a significant and distinguishable entity whose components may lack individual distinction.⁵

The Colombo Building would appear to qualify under the first requirement. The Colombo Building is a well-conceived example of a two-story commercial building type, consisting of a high ground floor story containing individual retail shops or businesses and a second story occupied by offices. Executed of concrete construction and with cement stucco, cast stone and sheet metal ornamentation, the style of the building is Beaux Arts Classicism, one of the early 20th-century revival styles.

In addition, the architects of the building were James and Merritt Reid, recognized masters working in San Francisco during the first portion of this century. Among examples of their work are the Fairmont Hotel at 950 Mason Street of 1906 and the Fitzhugh Building on Union Square of 1923 (now demolished). In order for the Colombo Building to qualify as the work of a master, it is necessary to show that this particular building expresses "a particular phase of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft."⁶ [Emphasis added.] The requirement is to show that this building is not just an example of the master's work, but an individually important example. The historic architecture consultants do not believe that to be the case, given the large number of other works for which the Reid Brothers may be remembered. This building is not sufficiently large or innovative to qualify for listing simply because it is the work of masters.

Criterion C is still met, however, because the building embodies distinctive characteristics of its type, period, and method of construction. This building type, in addition to being answered immediately across Columbus Avenue by the Fugazi Bank/Old Transamerica Building, is characteristic of commercial buildings in and beyond the downtown in San

Francisco and in town centers across the country during the first two decades of this century. In design and method of construction, the building is exemplary as well. For these reasons, the Colombo Building could be eligible to be placed in the National Register of Historic Places under Criterion C.

Level of Significance

The National Register provides for three levels of significance: local, state, and national. In this way it is possible for modest properties, which might not have substantial regional or national importance, to be listed in the Register for having local significance. The Colombo Building may be of local significance, since it is finely designed and well executed.

Integrity

In the opinion of the historic architecture consultants, one of the factors that has to be considered for the Colombo Building to be rated eligible for the National Register is that it must possess sufficient integrity to be able to convey its significance.

To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the four criteria discussed above, but it also must have integrity. That is, it must be sufficiently whole, and related to its surroundings, so that the qualities which set it apart from other properties can be understood by observers. The seven aspects of integrity listed in National Register Bulletins are location, design, setting, materials, workmanship, feeling and association.⁷ If a building has been moved, its integrity of location has been lost. If its setting has changed over time, this portion of its integrity may have been lost. If original materials and workmanship have been overlaid with later construction, these aspects of its original quality may have been lost. Feeling and association stem from a consideration of combinations of all of these aspects, and are more subjective qualities. Of the foregoing, all seven are generally met by the Colombo Building with the possible exception of materials and workmanship, which relate to the building's current state of disrepair. Although the setting adjacent to the project block has changed dramatically to the south, the Fugazi/Transamerica Building to the east and the buildings to the west and north are still intact.

Under Criterion C, a property such as the Colombo Building (which has lost some of its physical character) may still be eligible if it retains the majority of the features that illustrate its style.⁸ Key elements which the building has lost include the formerly open or glassed-in rotunda at the gore corner (triangular opening) between Columbus Avenue and Washington Street; at least six second-story window units; and certain store fronts and store-front detail.

Rotunda

Photograph 4 of the Historic Resources Study shows the rotunda portion of the building. Four Ionic columns are arranged along an arc which connects the Columbus Avenue and Washington Street property lines. The columns are flanked by Ionic pilasters. Blank stucco panels have been inserted between the columns and between column and pilaster at each end. It is not known what the design previously was, but it is clear that the original design has been rudely interrupted.

Second Story Window Units

Photograph 6 of the Historic Resources Study shows those window units, constructed of extruded aluminum and glass, which have been used to replace original wood and glass units seen elsewhere on the building. The character of these units is less satisfactory than original ones.

Store Fronts

Photograph 3 of the Historic Resources Study shows a series of store fronts along Columbus Avenue, each with different signage, rhythm, materials and character. In buildings of this sort, it was assumed that store fronts would change over time, and the design of the overall composition was strong enough to allow this. Photograph 7, however, shows something approaching the original character.

While assessments of what constitutes sufficient integrity are among the most difficult to make, this building as it stands possesses sufficient original material to be able to convey its meaning, style, type and design to the historic architecture consultants.

The historic architecture consultants believe that based on the above analysis, the building could qualify to be placed in the National Register of Historic Places under Criterion C: Design/ Construction.

NOTES: Historic, Architectural, and Cultural Resources

1. National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation. Washington, D.C.: U.S. Department of the Interior, National Park Service, Interagency Services Division.
2. National Register Bulletin 15.
3. Bloomfield, Anne. Draft Case Report: Colombo Building, San Francisco: Landmarks Preservation Advisory Board, October 1996.
4. Bloomfield, Anne. Op. cit.
5. National Register Bulletin 15.
6. Ibid.
7. Ibid.
8. Ibid.

Comment

"IMPACTS - Pages 118 and 119, paragraph 1. Please discuss: ' . . . which may be eligible for listing on the National Register' (See also comment [above].) Further, it should properly be 'in' instead of 'on' the National Register." (Gee Gee Platt, G. Bland Platt Associates)

Response

See above response for a discussion of National Register eligibility as it relates to the Colombo Building. Though National Register Bulletins use "in," "for," and "to" the National Register, they do not use "on." Other federal publications, including *The National Register of Historic Places, 1976*, do use "on." The following changes are made to the SDEIR:

Page 17, last paragraph, line 2, change "on" to "in."

Page 51, last paragraph, line 6, change "on" to "in."

Page 118, third paragraph, line 2, change "on" to "in."

NEIGHBORING PROPERTIES

Comments

"The eligibility of neighboring properties as local landmarks or as National Register-eligible properties should be determined." (David Bahlman, The Foundation for San Francisco's Architectural Heritage)

"An analysis of the eligibility of neighboring properties, regardless of whether previously identified as historic, or evaluated as part of a survey, for eligibility as local landmarks, or for inclusion in the National Register should be provided. This information is necessary to assess the impact of the project on known and potential historic resources. Lack of a previous evaluation of properties for historic or architectural significance does not mean that they are insignificant." (Michael Crowe, Landmarks Preservation Advisory Board)

"Significant environmental effects of the proposed Project on historical and architectural resources are not adequately described or examined as required by CEQA. In addition to the Project's direct impact on the Columbo [sic] building, CEQA requires the identification and examination of the Project's environmental effects, including its direct impacts, on other known and unknown historic resources in the area whether they have been previously identified as historically significant or not. As to known historic resources, the SDEIR fails to identify and analyze the Project's impacts on Jackson Square Historic District or on the proposed Chinatown Historic District. For example, a discussion of the potential impact of the architectural design of the proposed new buildings and their visual impact on these historic districts must be included. The statement on page 67 of the SDEIR that the public views or vistas would not be affected is simply inaccurate. Figure 16 on the bottom of page 50 clearly shows that the proposed replacement structure for the Columbo [sic] building will be out of character and scale with the Old Transamerica Building and the other buildings on Columbus Ave. and will thereby significantly and adversely impact the public vista from this gateway into North Beach.

"As to the additional requirement that the Project's impacts on unknown potential historical resources must be assessed, the SDEIR is inadequate under the requirements of CEQA in its failure to analyze the eligibility of neighboring buildings for inclusion in the National Register or for local landmark designation. CEQA requires such an analysis even if previous surveys and studies failed to identify such resources." (Nancy Shanahan, Attorney at Law)

Response

The SDEIR analyzes the potential effects of the proposed project on the neighboring properties under various topics such as land use and zoning (pages 64 to 66) urban design and site visibility (pages 66 and 67), shadow (pages 67 to 78), wind (pages 77 to 79), historical, architectural and cultural resources (80 and 81), transportation (pages 81 to 99) and air quality (pages 99 to 102).

As part of the Section 106 review process (see response on page C&R.44) independent of the analysis in the SDEIR, Page & Turnbull has prepared a matrix of all properties within a nine city-block area centered upon the subject site, indicating to which of various districts, surveys, registers, or lists the properties pertain. There are five properties next to or near the Colombo Building in Assessor's Block 195, which may not have been evaluated as part of other surveys or districts. These five properties were not included in adjacent district evaluations, and they do not rise to the level of significance of the Colombo Building. Therefore, they were not individually described or rated in the Historic Resources Study. For these five properties, Page & Turnbull has prepared State of California Historic Resources Inventory forms. The consultant's analysis led to the conclusion that the five buildings could be contributor buildings to a future documented historic district. For informational purposes, the forms and the matrix of all properties in the nine-block study area are found in C&R Appendix A, pages C&R.80 to C&R.101. The information in these forms does not affect the analysis and conclusions in the SDEIR by the historic architecture consultants.

On page 80, the SDEIR states that some private views of buildings in the Jackson Square Historic District and a potential Chinatown Historic District may be affected by the proposed project. While street scenes and views from sidewalks would be altered, the proposed project would not substantially degrade or obstruct scenic public views or vistas.

Comment

"Figure 1 should differentiate between properties which are city landmarks and those which are architecturally significant; locally we refer to properties in local surveys and Historic Resource Inventories (undesigned) as architecturally significant. This figure does not make mention of properties included in the State Historic Resource Inventory and those identified as contributory

in the Chinatown Element of the San Francisco General Plan." (Michael Crowe, Landmarks Preservation Advisory Board)

Response

Figure 1 in the Page & Turnbull *Kearny Street/Columbus Avenue Historic Resources Study*, has been revised (see Figure C&R 5, page C&R.38) to differentiate between properties in the study area which are City Landmarks and those which are architecturally significant as identified in the 1976 DCP survey. Those buildings that are contributory in the Chinatown Element of the *San Francisco General Plan* are also identified in Figure C&R 5.

Comment

"PAGE AND TURNBULL REPORT. Figure 1 - Please check for completeness, especially in Chinatown. Historic photos - There should be some available of the building and neighborhood. Please include here and in [the] DEIR." (Gee Gee Platt, G. Bland Platt Associates)

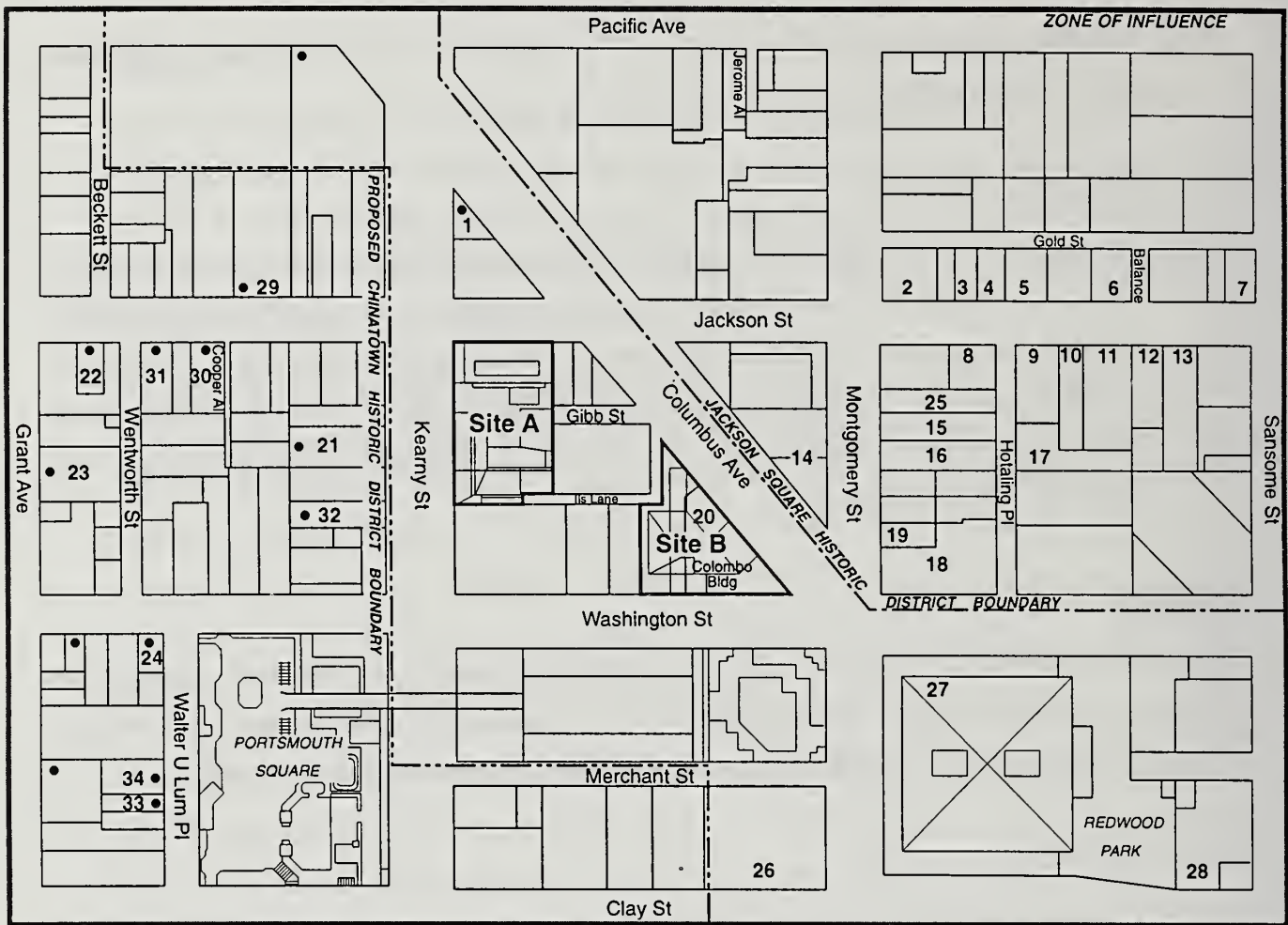
Response

As noted in the above response, Figure 1 has been revised to show which buildings are City landmarks and those which are architecturally significant. Research of the archives failed to obtain any historic photos of the Colombo Building. Two publications reviewed by the historic architecture consultants contain excellent collections of historic photographs of San Francisco's Chinatown: *Photographs of San Francisco's Old Chinatown*, by Arnold Genther, New York, Dover Publications, 1984; and *Bridging the Pacific: San Francisco Chinatown and Its People*, by the San Francisco Chinese Historical Society of America, 1989. Due to the time constraints required to obtain the publishers' permission, selected photos are not included in this report.

JACKSON SQUARE/CHINATOWN

Comments

"The project's effect on the proposed Chinatown and the Jackson Square historic districts should be analyzed." (David Bahlman, The Foundation for San Francisco's Architectural Heritage)



LEGEND

City Landmarks	Landmark No. & Effective Date	S.F. DCP Inventory	Heritage	Architecturally Significant Buildings	S.F. DCP Inventory	Heritage
1 Columbus Tower (Sentinel Bldg)	33 6/707	5	A	18 700 Montgomery St	3	
2 800-804 Montgomery St	26 3/70	4		19 710 Montgomery St	3	
3 470 Jackson St	22 3/70			20 Colombo Bldg (1 Columbus Ave)	3	B
4 472 Jackson St	23 3/70	4		21 833 Kearny St	3	B
5 458-60 Jackson St	25 3/70			22 675 Jackson St	3	
6 432 Jackson St	24 3/70	3		23 930 Grant Ave	3	B
7 400 Jackson St	27 3/70	2		24 743 Washington St	3	C
8 473 Jackson St	20 3/69	5		25 732 Montgomery St		B
9 451 Jackson St	12 2/69	5		26 601 Montgomery St (Pony Express Site)		
10 445 Jackson St	13 2/69	5		27 Transamerica Pyramid (Montgomery Block)		
11 441 Jackson St	14 2/69	4		28 505 Sansome St (Niantic Ship/Hotel Site)		
12 415-431 Jackson St	15 2/69	4		29 626-636 Jackson St		B
13 407 Jackson St	16 2/69	1		30 645-649 Jackson St	1	B
14 Transamerica Bldg (4 Columbus Ave)	52 3/73	4		31 661-665 Jackson St/60-68 Wentworth St		B
15 728-730 Montgomery St	10 2/69	3		32 825 Kearny St		B
16 Belli Bldg (722 Montgomery St)	9 2/69	4		33 17-19 Walter U Lum Pl (Brenham Pl)		B
17 32-42 Hotaling Pl	11 2/69	5		34 21 Walter U Lum Pl (Brenham Pl)		B

- Structure on list of significant buildings in Chinatown; Survey, December, 1985



Source: During Associates

HISTORIC ARCHITECTURAL RESOURCES C&R FIGURE 5

"Analysis of the project's direct and indirect effect on Jackson Square and the proposed Chinatown Historic Districts should be provided. Especially the architectural design of the buildings proposed and their visual impact on the historic districts." (Michael Crowe, Landmarks Preservation Advisory Board)

Response

The historic architecture consultants have analyzed potential effects of the project on Jackson Square Historic District and the proposed Chinatown Historic District. Their conclusion, detailed below, is that while the project would be of a somewhat larger scale than these districts and the taller buildings to the east, it serves as a transition from newer highrise and mid-rise structures. It also incorporates appropriate design features consistent with the adjacent existing and proposed historic districts. Therefore, the project would not have a potentially significant visual and aesthetic impact or otherwise diminish the historic nature of these districts (also see response on page C&R.20 regarding urban design and site visibility).

Pages 8 through 10 of the *Kearny Street/Columbus Avenue Historic Resource Study*, together with page 101 of the FEIR and page 80 of the SDEIR, discuss project effects on historic resources. Proposed development on Site A is directly across Kearny Street from the proposed Chinatown Historic District. Persons on the sidewalks on the west side of Kearny Street, and possibly on the blocks to the west and south, could observe the proposed project directly and could make comparisons between the new project and the Chinatown area.

Proposed development on Site B would be across Columbus Avenue from the Jackson Square District, and could be seen from portions of the two blocks east of the project site across Columbus Avenue.

In addition, the presence of the proposed buildings on Sites A and B, rising to 15 and 10 stories respectively, could be perceived on blocks contiguous to the sites, as well as beyond, including the historic areas. Although lower and less bulky, the proposed project could be analogous to the larger buildings in the area such as the Appraiser's Building, immediately east of the Jackson Square district, or to other buildings immediately south, in that the building would be higher than the buildings in the Jackson

Square District. As noted in previous responses, the project would be a transition from the higher buildings in the Financial District to the North Beach area.

Kearny Street (Site A)

The proposed construction would not be of the same size or scale as that of properties across the street. The new composition, while larger, would also be placed on a large site and would consist of three basic elements: school/community center, housing base, and housing tower. The housing tower would be higher and bulkier than opposite properties, but would be set back from the property line along Kearny.

Concerning composition and detailing, the lower structures of the proposed construction would be in a contemporary idiom but organized vertically into three zones, corresponding to base (storefront), shaft (central stories), and capital (uppermost story), which is typical of traditional design in both of the historic districts. The use of brick, punched window openings in the lower stories, and broken massing does relate to the composition and detailing of the district immediately opposite, though it does not exhibit ornamental detail in the form of moldings, friezes, or the like. Presence or absence of this kind of detail is not necessarily inconsistent in the proposed Chinatown Historic District; certain buildings have been "stripped," or classical detail may have been replaced with signs or detail deriving from Chinese culture.

The housing tower would differ in height and bulk from those buildings within the proposed Chinatown Historic District, immediately opposite the project. It would be closest in scale to the structures at 900 and 916 Kearny Street, and would provide a transition to the taller structures at the edge of the Financial District. It should be noted that at other locations in Chinatown there are housing blocks of substantial size, as can be seen in the photomontage from Nob Hill, Figure 21, which looks east along Washington Street. One-half block to the southwest of the project block is the 110-foot-tall Empress of China Building on the west side of Portsmouth Square. The building at Washington and Stockton Streets, seen in this figure, would be similar to the proposed project.

Columbus Avenue (Site B)

The proposed construction would be on a larger scale than that of the Fugazi Bank/Old Transamerica Building, immediately opposite, which is a part of the Jackson Square District. However, it would be of a lower scale than the buildings immediately south of Washington Street or the Appraiser's Building east of Jackson Square Historic District.

The proposed street frontages of the buildings would be similar in length to the existing Colombo Building. The facade would include three elements (base, mid-range and roof) that would reflect the height and design of the buildings to the east. The windows would be designed to be similar to the vertically oriented window openings of the historic buildings, and the base level facade would have cornices separating zones of the elevation that echo the facade of the Fugazi/Transamerica Building. The project sponsor would select colors and textures for the facade elements that would imitate the same patterns of the historic district.

Comment

"PAGE AND TURNBULL REPORT - Page 4 - paragraph 2. Jackson Square has a number of 1850's buildings." (Gee Gee Platt, G. Bland Platt Associates)

Response

The commenter is correct that there are a number of 1850s buildings in the Jackson Square District. The reader is referred to *Jackson Square*, a publication of the Department of City Planning, June 1971, which shows street elevations and dates of all buildings. The document was reviewed by the historic architectural consultants.

ZONE OF INFLUENCE

Comments

"A discussion of the factors considered (visual shadow, land uses, etc.) in the delineation of projects' Zone of Influence is needed." (Michael Crowe, Landmarks Preservation Advisory Board)

"PAGE AND TURNBULL REPORT. How was [the] Zone of Influence determined?" (Gee Gee Platt, G. Bland Platt Associates)

Response

The Zone of Influence, a nine-city-block area centered upon the subject sites, was intended to be an area analogous and identical to the Area of Potential Effect (APE) – that area, used under provisions of Section 106 of the National Historic Preservation Act (see response below), which indicates the extent of effect of the proposed project. To differentiate analysis under the SDEIR from Section 106 analysis, a different term was used, but the intent was the same: to set off an area in which the effect of the proposed project could be perceived.

This area was defined in a meeting between project representatives, City personnel, the State Office of Historic Preservation, and representatives of the Department of Housing and Urban Development. The meeting was held on July 24, 1996, and a possible APE to be used in Section 106 analysis was discussed. All present agreed on the nine-block area for a Section 106 study. Although not required by CEQA, the area was used for analysis in the SDEIR and is intended for use under Section 106.

The factors considered in determining the nine-block area included siting of the project; location of the existing and proposed historic districts; visual character of the blocks; ability to discern high buildings from distant viewpoints; extent of sunlight and shadow before and after project construction; and character of existing construction.

SECTION 106

Comments

"The project approvals section of the report does not provide information on the federal historic environmental review process applicable to the project which is a federal undertaking and subject to Section 106 review pursuant to the National Historic Preservation Act of 1966. This discussion should specify that the Landmarks Preservation Advisory Board/Department of City Planning as the Certified Local Government (CLG) will have a significant role in the Section 106 consultation process and that preliminary meetings between HUD [Housing and Urban Development], the State Historic Preservation Office and the CLG, indicate that the project would have an adverse effect on historic properties and therefore would require execution of a Memorandum of Agreement (MOA)." (Michael Crowe, Landmarks Preservation Advisory Board)

"The SDEIR should also inform members of the public and decision makers, because federal HUD money will be involved and the Project as proposed will have an adverse effect on historic properties, the Project will be subject to a federal level historic environmental review process under Section 106 of the National Historic Preservation Act of 1966, which will involve consultation and negotiation of a Memorandum of Agreement." (Nancy Shanahan, Attorney at Law)

Response

The proposed senior housing for Site A would be funded by the U.S. Department of Housing and Urban Development (HUD), and therefore, the project will undergo federal environmental review as required by the National Environmental Quality Act (NEPA). This additional environmental review includes Section 106 review pursuant to the National Historic Preservation Act of 1966. Because the project sponsor has linked Sites A and B, Section 106 deems the federal undertaking to be the entire scope of the project including new construction on both sites. The Section 106 review requires the lead agency, in this case HUD, to identify the project's Area of Potential Effect (the zone of influence), and to determine whether there are properties within the APE which are potentially eligible for inclusion in the National Register of Historic Places. The lead agency is also required to provide for public participation, and to seek the views of "interested persons," in the Section 106 consultation. If eligible/historic properties are found within the APE, the lead agency is required to determine whether the project, a federal undertaking, could have an effect on the properties and their National Register eligibility. An undertaking would have an effect if it resulted in changes in the character or use of the historic properties within the APE. A finding of adverse effect requires the execution of a formal Memorandum of Agreement (MOA) between the lead agency, the project sponsor, the Landmarks Preservation Advisory Board/Planning Department as the Certified Local Government (CLG), the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP). The MOA would set forth stipulations designed to mitigate the adverse effects of the project's implementation on historic resources.

As noted in the above response, on July 24, 1996, a joint Kearny Street/Columbus Avenue Project on-site meeting was held between HUD, the project sponsors and their environmental consultants, the SHPO and Planning Department staff representing the CLG. The purpose of the meeting was to familiarize the Section 106 consultation participants with the project site and surrounding environs, to discuss the identification of an APE and historic properties within the APE, and to make a determination of effect. At the close of the meeting, it was generally agreed that the undertaking would result in an adverse effect on historic properties requiring the preparation of a Memorandum of Agreement. The MOA stipulations would address, but not be limited to, the demolition of the Colombo Building, archaeology on Sites A and B, and the design compatibility of the new construction.

Commission certification of the SEIR and authorization of the new CU/PUD, including the conceptual architectural design for the new construction on both Sites A and B, would precede the Section 106 consultation. The 106 consultation will require refinement of the project design in order to comply with the implementation of the MOA. The design development process would seek to ensure architectural compatibility between the new construction and the surrounding historic properties.

The following paragraph is added to the SDEIR on page 43 after the last paragraph:

"The proposed senior housing for Site A would be funded by the U.S. Department of Housing and Urban Development (HUD), and therefore, the project will undergo federal environmental review as required by the National Environmental Quality Act (NEPA). This additional environmental review includes Section 106 review pursuant to the National Historic Preservation Act of 1966. A finding of adverse effect would require the execution of a formal Memorandum of Agreement (MOA) between the lead agency, the project sponsor, the Planning Department as the Certified Local Government (CLG), the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP). The MOA would set forth stipulations designed to mitigate the adverse effects of the project's implementation on historic resources."

TRANSPORTATION

Comment

"We own the adjacent Holiday Inn property and have serious concerns about the traffic review of the supplemental EIR. A significant number of guests in our 572-room hotel must exit Kearny Street through this already 'bottle-necked' Jackson Street block (see photo attached) to reach the freeways or local destinations. The proposed 156-car garage with its entrance/exit on Jackson would further block the already heavy on-going Kearny Street traffic at the intersection and, in exiting, would delay and confuse Jackson Street traffic in an attempt to reach the left lane for northbound or eastbound destinations.



"As a significant neighbor, we have watched this site for 30 years and we know that a public garage entering and exiting on Jackson Street is:

1. A traffic disaster proposed to happen.
2. Certain to seriously delay our 572 tax paying guests in exiting our hotel.
3. Approximately 3 times the amount of garage spaces needed for the residential hotel, school and retail." (Harold Moose, Justice Investors)

Response

The proposed project's 154-space parking garage (147 commercial/public spaces and seven residential/private spaces) would have its entrance/exit off of Jackson Street, between Kearny Street and Columbus Avenue, while the Holiday Inn garage driveway is located on Washington Street, between Kearny and Washington Streets. As such, there would not be any direct conflicts between these two garage driveways, because they are located on two different streets.

In order to determine whether the operations of the parking garage would cause queues to develop into the upstream intersection (i.e., Kearny Street) as vehicles enter the garage, a queuing analysis was conducted (found in Section 4.2.2 in the *Kearny/Columbus Transportation Report* by Kolve Engineering, September 1996, which is available for public review in project File No. 94.615E, at the Planning Department, 1660 Mission Street, Fifth Floor, San Francisco). The results of the analysis indicate that the vehicles entering the parking garage on Jackson Street would not back up and block the Kearny Street intersection, as no queues would develop. this conclusion was made even after assuming a worst-case scenario [i.e., all 147 commercial vehicles would be parking during one hour within the AM peak period (7:00 to 9:00 a.m.)]. In actuality, the parking garage is unlikely to be fully occupied at all times and vehicles would most likely be dispersed over a two- or three-hour time period in the morning.

As for vehicles exiting the parking garage, any delays would only cause vehicles to back up into the garage, thus not impacting roadway operations on Jackson Street. In addition, it is not anticipated that there would be any impact to vehicles attempting to enter the traffic stream on Jackson Street from the garage, since the existing traffic signal at Kearny Street/Jackson Street would create gaps in the traffic flow.

Comment

"The 1987 EIR gave a low "C" rating to this block and we wonder if the supplemental EIR has thoroughly considered the effect of ten years of traffic increases, and the effect of the 1989 earthquake and demolition of the Embarcadero Freeway." (Harold Moose, Justice Investors)

Response

As noted on page 52 of the SDEIR, the discussion of traffic and circulation in the FEIR is outdated, and a new transportation analysis for the project was warranted. The analysis in the SDEIR is based on *Kearny/Columbus Project Transportation Analysis*, Kolve Engineering, September 1996.

Traffic operating conditions at intersections adjacent to the proposed project have changed since 1987. Following the 1989 Loma Prieta earthquake and the demolition of the Embarcadero Freeway, traffic volumes on the streets leading to the freeway on-ramps and off-ramps decreased, as traffic was redistributed to available ramps and local City streets. Comparison of traffic volumes at the intersections of Montgomery/ Washington, Kearny/Broadway and California/Kearny between pre-earthquake and existing conditions indicate generally lower traffic volumes. For example, due to the removal of the Washington off-ramp, traffic volumes decreased on Washington Street in the vicinity of the project by approximately 125 vehicles per hour (vph). Similarly, due to the removal of the Broadway ramps, traffic volumes on Kearny Street approaching Broadway decreased by 75 vph, and eastbound and westbound volumes on Broadway decreased by 850 vph. (Traffic volumes have increased elsewhere in the Chinatown area, primarily on Stockton Street.)

The reduction in the number of vehicles on the roadways in the vicinity of the proposed project has resulted in somewhat better operating conditions than under pre-earthquake conditions. With the proposed project, all study intersections would operate at Level of Service (LOS) B during the PM peak hour. LOS A, B and C represent operating conditions with minimal to moderate delays for drivers. In San Francisco, operating conditions of LOS E or F, indicating significant to excessive delays, are considered undesirable and deemed significant impacts.

Comment

"There is also a current traffic problem for our guests who must right turn from Washington Street at the busy Kearny Street intersection. The proposed Kearny Street drop-off will certainly aggravate this problem, especially considering the 'parent-student double-park and wait' habit so prevalent at other San Francisco Schools." (Harold Moose, Justice Investors)

Response

A passenger drop-off analysis was conducted in order to determine whether the proposed school drop-off area on Kearny Street would cause impacts to traffic operations on this street (see Section 4.2.6. in the *Kearny/Columbus Project Transportation Analysis*, Korve Engineering, September 1996). The results of the analysis indicate that there would be a sufficient number of vehicle passenger loading spaces (seven), provided by a proposed white zone, to accommodate the estimated loading demand. As such, it is not anticipated that there would be any vehicle queuing beyond the proposed loading area; therefore, there should be no need to double-park.

It also should be noted that both Washington and Kearny Streets are one-way streets with multiple lanes. This configuration allows for easier maneuvering of vehicles around double-parked cars.

Comment

"The school program with its entry on Kearny [Street] could present a major traffic problem when school is [let] out and parents pick up children. (Example: Washington Square when the Catholic School lets children out.)" (William Stout, William Stout Architectural Books)

Response

The drop-off and pick-up of children was considered in the design of the proposed school and the drop-off area. In addition to the three-space recessed drop-off zone directly in front of the school, a passenger (white) zone of approximately 75 feet would provide for additional queuing area without substantially affecting traffic on Kearny Street.

As noted in the *Kearny/Columbus Project Transportation Analysis* on pages 41 and 42, the after-school programs that would be provided by the school, including language classes and gym activities, would serve to reduce the number of children leaving classes at the same time, and therefore would reduce the pick-up demand at any given time. Approximately 30 to 40 percent of the children would be anticipated to participate in these after-school programs. In addition, the kindergarten children are let out earlier than the grade school children, which would also serve to disperse the pick-up demand over a longer period of time.

NOISE

Comment

"Additionally, the school's building play area should be enclosed (or have noise-protected fencing) rather than an apparent open roof. The EIR should study the noise decibels from a smaller school in an adjacent Merchant Street roof which has forced our hotel to move day-sleeping airline guests to the now-threatened opposite exposure." (Harold Moose, Justice Investors)

Response

The hotel is concerned about noise that would be generated by the proposed playground, based at least in part on its experience with the Chinese Education Center's existing rooftop playground on the opposite side of the Holiday Inn building across Merchant Street. This playground is about 70 feet from the nearest hotel room. Daytime sleepers assigned to rooms overlooking the Chinese Education Center have complained of not being able to sleep due to the noise of the children playing in this playground. According to the management, complaints have been received from rooms on all floors overlooking Merchant Street, and daytime sleepers have had to be reassigned to rooms on the opposite side of the building.

An evaluation by Illingworth and Rodkin Inc., acoustic engineers, was made of the potential noise impact of children playing on the rooftop playground atop the fourth floor of the proposed Kearny Street/Columbus Avenue building. Noise measurements were made at the hotel on Friday, November 1, 1996. The measurements confirm that the project would not have a significant noise impact on the Holiday Inn. The background

noise level in rooms on both sides of the building were measured, as well as the noise generated by the children playing at the Chinese Education Center playground. The playground would be about 200 feet from the nearest hotel room. The hotel rooms at the Holiday Inn do not start until the fifth floor. All of these rooms would look down on the playground. The noise measurements were made on the fifth and fifteenth floors. The background noise level is highest on the fifth floor overlooking Merchant Street. This is because these rooms overlook the louvers for the mechanical equipment associated with the Holiday Inn which is located on the Merchant Street side of the building. The background average noise level in the fifth floor rooms is 44 dBA, primarily due to mechanical equipment noise. Background noise levels on the fifteenth floor were significantly lower. The background average noise level in the fifteenth floor was measured at 37 dBA. Average background noise levels on the opposite side of the building were similar on both the fifth floor and the fifteenth floor, ranging from 36 to 37 dBA.

When 25 to 30 children were playing on the rooftop playground at the Chinese Education Center (the most observed at one time), the maximum instantaneous noise levels were measured inside the fifth floor rooms overlooking the playground at 40 to 46 dBA. On the fifteenth floor these levels ranged from 35 to 41 dBA. Note that these are the maximum noise levels generated during several hours of observation. Most often the sound of the children was audible but not measurable above the background noise level. The noise levels associated with children playing would not normally be expected to awaken somebody, but due to the quality and nature of the noise, it could stand out from the otherwise relatively benign background sounds of traffic and mechanical noise. Simply because of its audibility and quality, it could make it difficult for someone to fall asleep. Because of the relatively higher background noise level on the fifth floor, there was little difference between the noise of the children playing and the background noise on the fifth or the fifteenth floors. In both cases, the maximum noise levels at worst exceeded the background noise level by 4 to 5 dBA. When the sound of the children playing reached these higher levels they were clearly audible and, although not particularly startling, were noticeable above the background noise level. When the sound of the children dropped to the average background noise level, the noise was much more subtle and difficult to pick out.

By contrast, the proposed playground for the project would be over twice as far from the hotel as the existing rooftop playground. The maximum noise levels due to children playing would be about 7 dBA lower at the Holiday Inn than from the Chinese Education Center playground. The maximum noise generated by children playing would, therefore, be about 39 dBA in the rooms overlooking Washington Street. This would represent the highest noise levels expected and typically noise levels of children playing would be lower. Since the typical daytime average noise level is about 37 dBA, this means that at the worst, noise levels would only exceed the background noise level by 2 dBA (a barely noticeable increase) and generally would be below the background noise level. There are any number of other events that generate higher noise levels in rooms overlooking Washington Street. Sirens, horns, housekeeping, trucks, etc., all generate significantly higher noise levels in these rooms. Therefore, although the sound of children may be occasionally audible in these rooms, the noise they generate would be subtle and would not noticeably exceed the background noise level in the area. This would not be considered a significant noise impact.

MITIGATION MEASURES

Comments

"The EIR does not provide adequate mitigation for the loss of the Colombo Building." (David Bahlman, The Foundation for San Francisco's Architectural Heritage)

"Regarding Mitigation Measures for the Colombo Building, HABS recordation alone is not sufficient. Please consult the Landmarks Board and Heritage for additional mitigation measures." (Gee Gee Platt, G. Bland Platt Associates)

"The Board recommends that the Environmental Review Officer consider off-site mitigations within the historic districts in the immediately affected area. The report does not provide adequate mitigation for the loss of the Colombo Building. In addition to the (HABS) drawings and photographs, the report should explore creative mitigation measures such as publication of the building's history, preparation of a documentary video and/or creation of a pictorial commemorative exhibit/display in the neighborhood. Mitigation of visual impacts created by the construction of a 15-story residential tower in an area immediately adjacent to two historic

districts is not addressed. The importance of the historic resources in the area is in part due to the pattern of development which is characterized by small-scale buildings on small lots. Requiring that the architectural design of new construction conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties would be appropriate mitigation which would provide some assurance that architectural compatibility with significant historic resources in [the] area is addressed." (Michael Crowe, Landmarks Preservation Advisory Board)

"The SDEIR does not set forth adequate Mitigation Measures. The project will cause a series of adverse environmental impacts which must be either avoided or mitigated pursuant to CEQA (Public Resources Code, §21100(c) and CEQA Guidelines, §15126(c)). In addition, CEQA prohibits a public agency from approving or carrying out a Project unless it has '[e]liminated or substantially lessened all significant effects on the environment where feasible.' (CEQA Guidelines §15092 (b)).

"Adequate mitigation is not provided for the loss of the Columbo [sic] building. In addition, mitigation of the visual impacts created by the construction of a 15-story tower in an area immediately adjacent to two historic districts is not addressed. At a minimum, some assurance must be provided to guarantee architectural compatibility of the new structures with the character and small scale of the buildings and historic resources in the area." (Nancy Shanahan, Attorney at Law)

Response

It is possible to include additional documentation of the Colombo Building, such as a documentary video and/or a pictorial commemorative exhibit/display in the neighborhood as part of the mitigation requiring HABS recordation.

With respect to off-site mitigations within the historic districts in the immediately affected area, Article 10 of the *San Francisco Planning Code*, "Preservation of Historical, Architectural and Aesthetic Landmarks," and Article 11, "Preservation of Buildings and Districts of Architectural, Historical and Aesthetic Importance in the C-3 Districts" already provide mechanisms for the preservation of significant historic buildings, particularly Section 1109 Preservation Lots: Eligibility for Transfer of Development Rights.

The Secretary of the Interior's *Standards for the Treatment of Historic Properties* is an illustrated and newly published [1995] compilation by Kay D. Weeks and Anne E. Grimmer of the National Park Service, which contains *Standards for Preservation and Guidelines for Preserving Historic Buildings; Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; Standards for Restoration and Guidelines for Restoring Historic Buildings; and Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings*.

These standards primarily pertain to the treatment of historic properties and do not directly relate to new construction on a site where there was demolition of a potentially historic structure. There are recommended methods, however, that could be applied to new construction. For example, under the "Alterations/Additions for the New Use" chapter of the Rehabilitation section, the document recommends for new construction, "Designing new exterior additions for historic buildings or adjacent new construction which is compatible with the historic character of the site and which preserves the historic relationship between the building or buildings and the landscape."

The document does not recommend, "Introducing new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color and texture; which destroys historic relationships on the site; or which damages or destroys important landscape features."

Applying these standards to the proposed project would imply that the buildings should be designed to incorporate design features that would observe the designs of the adjacent historic buildings in terms of size, scale, design, materials, color and texture. The project sponsors have incorporated these considerations into the design of the project buildings. In addition, City design guidelines mandate that buildings must be compatible with the adjacent areas, thus, no additional mitigation would be required.

CEQA requires that, if an impact is determined to be potentially significant, the public agency must adopt feasible mitigation measures to address such an impact. If a potentially significant impact cannot be reduced to a level of insignificance by the imposition of feasible mitigation measures, a public agency may nonetheless approve a

project if it finds, pursuant to CEQA Section 15093, that if the benefits of a proposed project (such as affordable housing) outweigh the unavoidable adverse environmental effects (such as loss of an historic architectural resource, the demolition of the Colombo Building), and that the adverse environmental effects may be considered "acceptable." If it chooses to approve the project, the City Planning Commission must issue a Statement of Overriding Considerations that state the specific reasons to support its action.

Comment

"ARCHAEOLOGY/CULTURAL RESOURCES - See Summary (pages 8, 13 and 14); Mitigation Measures - Cultural Resources (pages 107 and 108). Please explain: 'During the monitoring program, the project sponsors would designate one individual on-site as its/their representative.' Is this an archaeologist? If not, what credentials would this person have? What would his responsibilities be to the City and County?

"What would be done with any cultural materials recovered? Having these become the property of the archaeologist is not acceptable." (Gee Gee Platt, G. Bland Platt Associates)

Response

The mitigation measure that the commenter references would require a representative of the project sponsor to be on the project site with the authority to stop demolition, site preparation or construction work after consultation with a trained archaeologist who would also be on site during excavation. This is to ensure that if the required on-site archaeologist determines that cultural artifacts are discovered during demolition, site preparation or construction, there would be an opportunity for the archaeologist to evaluate the resources with a minimum of disruption to the construction schedule. If the resource is deemed valuable, work would halt until the artifact is removed. If deemed significant, recovered cultural materials would be permanently curated in an appropriate repository (public display of the artifacts, donation to qualified institution, etc.).

Comment

"HYDROLOGY - Summary/Alternative B (page 18); Mitigation Measures (page 112). While the section generally seems to be complete, there appears to be no mention of the potential

negative impacts on nearby historic buildings, especially those built on land fill [sic] during the last century, including those in Jackson Square. Please add some language to indicate the project team's awareness of these possible problems, and how these would be monitored and mitigated." (Gee Gee Platt, G. Bland Platt Associates)

Response

As noted above in the section on Historic, Architectural and Cultural Resources, there is no identified historic building adjacent to the proposed project sites. The measures related to Geology (page 112 in the SDEIR) are intended to ensure that in the event of de-watering, settlement of adjacent buildings would be avoided. The contractors for both building sites would be required by the *San Francisco Building Code* to implement measures to prevent settlement and subsidence of adjacent streets, utilities, sidewalks and buildings.

ALTERNATIVES

Comment

"Preservation alternatives which would permit retention of the Colombo Building should be considered." (David Bahlman, The Foundation for San Francisco's Architectural Heritage)

Response

Comment noted. A Preservation Alternative is included among the alternatives on pages 118 and 119. As discussed in the SDEIR, the alternative which allows retention of the Colombo Building does not meet a number of the project sponsors' objectives, in particular, if it is financially unfeasible and would not allow for the below-market purchase price required for development of Site A. The City Planning Commission, however, will review all alternatives, including the Preservation Alternative, during the project approval process.

Comment

"An explanation of the City Planning Commission's responsibility to consider the project alternatives and to accept or reject the range of alternatives provided in the report and the

project sponsor's reasons for finding them infeasible should be provided." (Michael Crowe, Landmarks Preservation Advisory Board)

Response

Under Section 15126 of the CEQA Guidelines, EIRs must produce information sufficient to permit a reasonable choice of alternatives so far as environmental issues are concerned. The SDEIR should include a range of reasonable alternatives to the proposed project that could feasibly attain the proposed project's base objectives, and must evaluate the comparative merits of each alternative. The SDEIR states on page 115 that regardless of the project sponsors' reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site. As part of any approval action, the City Planning Commission motion would contain CEQA findings with reasons for accepting or rejecting alternatives examined in the EIR.

Comment

"Obviously, Alternative B, the Preservation Alternative, would be my choice for the project. There could be an additional Preservation Alternative, or this one could be tweaked a bit, to use the new construction adjacent to and on top of the Colombo Building as housing.

"The discussion of impacts of the Preservation Alternative, on page 118, should include that it conforms with the Urban Design Element of the *San Francisco General Plan*, especially: Objective 2, Policy 4, 'Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.'" (Anne B. Bloomfield, Architectural History)

Response

The Alternative B: Preservation Alternative was considered for office use. A residential use of the Preservation Alternative would have similar environmental effects as office use (although slightly fewer traffic trips during the PM peak hour) and would also not be acceptable to the project sponsors for the following reasons:

- A residential variant of the Preservation Alternative would probably entail a 6- to 7-story building with the gross floor area of each floor less than 5,000 sq.ft. and residential use on the existing second floor and proposed third floor of the Colombo Building. Such a configuration would limit the number of parking spaces which is essential for the economic viability of market-rate housing.
- The actual number of units would be restricted by rear yard and setback requirements, plus what the project sponsors believe to be the questionable desirability of housing units on the second floor above Columbus Avenue.
- The value of the property under such a limited residential version of the Preservation Alternative would not permit the project sponsors to sell Site A at a price that would be affordable to the subsidized housing and school/St. Mary's Catholic Center.

The SDEIR indicates on page 66 that the Urban Design Element objectives and policies discussed in the FEIR (Table 3 pages 82 through 84) are applicable to the proposed project. The commenter is correct in the observation that the Alternative B: Preservation Alternative would conform to Objective 2, Policy 4 of the Urban Design Element of the *General Plan*.

Comments

"ALTERNATIVE B - REASONS FOR REJECTION - Page 119. Why doesn't [the] project sponsor believe this alternative would 'provide reasonable return on investment'? What are the results of his calculations regarding use of the 20% Investment Tax Credit for rehabilitation of historic buildings? What would the economic benefit be of transferring development rights (TDRs)? Calculations should include the cost of demolition, archaeological costs including time the project may be shut down, retrieval, etc., and the costs in time and money to complete reviews under Section 106 of the National Historic Preservation Act. At present, the only financial information available in the document appears to be an approximate construction cost of \$6.8 million." (Gee Gee Platt, G. Bland Platt Associates)

"The project sponsor's reasons, on page 119, for rejecting the Preservation Alternative have no substantiation whatsoever. Detailed financial data is needed, to compare estimates costs and rentals. (There is no government guarantee of a 'reasonable return on the investment'.)

"In considering financial return, the Draft SEIR fails to mention and should discuss the possibility of earning the 20% Investment Tax Credit which is available for rehabilitations of historic buildings which meet the U.S. Secretary of the Interior's standards for Rehabilitating Historic Buildings. A rehabilitation of the Colombo Building with addition of a third story could qualify for this Credit. The credit should be figured into the cost comparisons for the Preservation Alternative." (Anne B. Bloomfield, Architectural History)

"The members of the Victorian Alliance, at their regular monthly meeting on October 30, 1996, agreed unanimously to express their concern about the Colombo Building on Site B of the proposed project.

"We are disturbed that the Preservation alternative — keeping the Colombo Building and constructing a new third floor plus a new building in the vacant lot next door — was rejected so summarily by the project sponsor.

"The sponsor evidently means the economic 'highest use,' but this may not be the best use from a city planning or urban design point of view. The urban design of two similar buildings at the gateway between North Beach and the Financial District is definitely worth keeping.

"The project sponsor has given no data whatsoever to back up their assertion that the Preservation Alternative would not generate enough money. The SEIR should show some actual dollar figures for comparison, and the dollars for the Preservation Alternative should include the benefits from using the State Historic Building Code, the federal investment Tax Credit for historic rehabilitation, and the Mills Act.

"Please have the Final SEIR discuss these urban design and financial questions." (Vikki-Marie Powers, President, The Victorian Alliance)

"The SDEIR's analysis of alternatives to demolition of the Columbo [sic] building is inadequate.

CEQA expressly requires agencies to consider 'a range of reasonable alternatives' to proposed projects and to evaluate their comparative merits. (Public Resources code, §21100; CEQA Guidelines, §15126 (a))

"Not only is 'Alternative B: Preservation Alternative' not adequately described or considered in the SDEIR, but the reasons set forth for the rejection of this alternative by the project sponsor are weak and unsubstantiated. No financial data whatsoever is included to support the project sponsor's claimed 'belief' that the restoration and expansion of the Columbo [sic] Building and construction of office space would not provide a 'reasonable return on investment.' Where are the cost comparisons? What about the possibility of using the 20% Investment Tax Credit available for rehabilitating historic structures? Why is this not considered? Would there be an economic benefit to transferring development rights (TDR's)? Sufficient information is simply not included in the SDEIR to allow for a meaningful evaluation [of] the comparative merits of the Project's alternatives." (Nancy Shanahan, Attorney at Law)

Response

The SDEIR evaluates five alternatives to the proposed project, including: A) No Project Alternative, B) Preservation Alternative, C) Reduced Housing on Site B Alternative, D) Office Use on Site B Alternative, and E) Smaller Building on Site A Alternative. The purpose of this analysis is to provide a reasonable range of alternatives to the proposed project, which could minimize or eliminate its potentially adverse effects on the environment.

Under the Preservation Alternative, the Colombo Building would be retained, and its extant historic architectural features would be preserved. Potential significant impacts of the proposed project on historic architectural resources, specifically demolition of the Colombo Building, would not occur under the Preservation Alternative.

The project sponsors have rejected the Preservation Alternative because they believe the site would be underutilized and a reasonable return on investment would not occur. As described on page 115 of the SDEIR, the City Planning Commission can approve an alternative to a proposed project instead of the project itself, regardless of a project-sponsor's stated reasons for rejecting the alternative.

The following information was based on a letter, dated November 13, 1996, provided by the project owner for Site B, Pan Magna, which describes in greater detail the existing analysis of reasons they have rejected Alternative B: Preservation Alternative and is on file in Case No. 94.615C and Project File No. 94.615E, for public review at the Planning Department, 1660 Mission Street, Fifth Floor, San Francisco:

As noted in the responses on pages C&R.5 and C&R.6, a critical factor in the economic viability of the project is the fact that the subsidized housing and St. Mary's Catholic Center on Site A is dependent on a below-market value land purchase price on Site A, which would not be financially feasible without either the commercial office development or market-rate housing on Site B.

As described in the SDEIR on page 118, the Preservation Alternative would contain 41,000 sq.ft. of office space. The floor sizes in the new building proposed, for the empty lot adjacent to the Colombo Building, would be 5,000 to 6,000 sq.ft. or less, which would make construction cost per rentable square foot higher than for a new office building with larger floor size.

The project sponsor has estimated that the total development cost to construct a typical new "A" grade office building to be in the range of \$190 per buildable square foot and \$225 per rentable square foot (exclusive of any land cost). The rents required to justify such costs are in the range of \$26 to \$29 net and would produce serviced rents of \$38 to \$41 per square foot per annum. The current average rent for "A" quality office space in the Central Business District is in the range of \$26 to \$28 serviced, or \$14 to \$16 net, well below what would be required to amortize the total cost of new development. Because of the inefficiency of the small floor plates in the Preservation Alternative, the total cost per rentable square foot would likely be greater for the Preservation Alternative buildings than for larger new buildings, so that an even higher rent would be needed to make the new component viable.

In addition, the Colombo Building would likely require a full structural and seismic upgrade (which could trigger other Building and Fire code-compliance requirements, including electrical, life safety, disabled access and exiting), as well as the addition of air conditioning to be rentable as a "B" grade building. The project owner of Site B estimates that the cost to rehabilitate the Colombo

Building would be in the range of \$185 to \$205 per gross square foot inclusive of the costs for construction and tenant improvements. The rents required to finance these costs are estimated to be in the range of \$25 to \$28 net, while the expected rents of that B-grade space would be in the range of \$11 to \$13 net, considerably less than what would be required to be economically viable.

If the Colombo Building were a designated City Landmark building, it could possibly qualify for historic tax credits of up to 20 percent of all costs spent within the existing shell of the building (this would exclude the new building and the third floor addition to the Colombo Building under the Preservation Alternative). The net effect of the tax credits could lower the needed rent to the range of \$21 to \$23 net, still much higher than could be supported by the estimated current rent levels.

The Mills Act is another economic incentive available for preservation of an historic property. It could give property tax relief to the project owner to renovate the Colombo Building. The basis for the reduction of property taxes is to lower the assessed value of the building by using a higher capitalization rate. The project owner estimated that a rate of 10.5 percent would achieve a normal assessment and a rate of 12.5 percent would achieve a Mills Act assessment. The project owner assumed that application of the Mills Act might reduce further the needed rents by approximately \$0.35 per rentable square foot. Such a reduction would not be significant enough to close the gap between the anticipated rent levels and the amount needed to justify the construction costs.

Thus, Pan Magna has concluded that even combined with the historic tax credit, the Mills Act does not provide enough economic benefit to warrant renovation of the Colombo Building.

If the Preservation Alternative were to be pursued, the State Historic Building Code could have a role in design development and permitting in the resolution of detailed architectural and code compliance issues by providing for alternative solutions to compliance with the *San Francisco Building Code*. However, it is not possible to determine at this point whether or not use of the State Historic

Building Code would result in any significant savings in development costs. Since Pan Magna had not intended to pursue the Preservation Alternative, detailed architectural and engineering analysis or solutions regarding the Alternative were not developed.

Section 127 of the *San Francisco Planning Code* provides for transfer to a lot basic gross floor area permitted under Section 124, from an adjacent lot occupied by a designated landmark but not built on the landmark property. The permitted base gross floor area for the Colombo Building under Section 124 is 2.8 to 1. The current gross floor area of the Colombo Building is approximately 2.0 to 1 (not counting mezzanines). With the addition of a new third floor equal to 75 percent of the current footprint of the Colombo Building, the Colombo Building would equal or exceed the permitted basic floor area ratio (FAR). Therefore, there would be little or no unused basic FAR from the Colombo Building which could be transferred to another lot, even if there were an "adjacent lot" which could utilize such transfer of floor area.

Comment

"ALTERNATIVE C - Impacts - Page 123, paragraph 3. Please explain: 'As the proposed project would not cause significant impacts in any of the areas, this alternative would not reduce any significant environmental effects.'" (Gee Gee Platt, G. Bland Platt Associates)

Response

As noted on page 114 of the SDEIR, the proposed project, by the demolition of the Colombo Building, would have a potentially unavoidable significant adverse impact on the historic resources at the project site. Alternative C:Reduced Housing on Site B would have the same potentially unavoidable significant effect as the proposed project. Since there are no other identified significant environmental effects for the proposed project or Alternative C, the alternative would not reduce any significant environmental effects.

Comment

"ALTERNATIVE D - REASONS FOR REJECTION - Page 125. Please explain last sentence, beginning with: 'However, the proposed CU/PUD amendment authorizing the residential

structure would not prevent the sponsor from proceeding with the previously approved office structure if economic conditions change" (Gee Gee Platt, G. Bland Platt Associates)

Response

As noted earlier in responses on page C&R.7, the project sponsor for Site B, Pan Magna, has an approved CU/PUD for construction of an office building on the project site. The proposed CU/PUD amendment to the approved authorization would allow a residential structure to be on Site B. In the event that Pan Magna obtains an amended CU/PUD for residential use, it could still have the option to proceed with the previously approved office CU/PUD. It is likely that Pan Magna would only exercise this option if the economic conditions changed to the point where an office use on the site would be more appropriate than residential uses. The CU/PUD amendment would also change the approved retail uses for Site A to school/St. Mary's Catholic Center use.

OTHER ISSUES

PROJECT APPROVAL

Comment

"In 1967, Justice Investors invested in the adjacent property after reviewing the character of the area, its existing building codes, and conformed to the strict guidelines of the S.F. Redevelopment Agency which still controls any alteration to the exterior of our building. We donated substantial funds to create the very popular Chinese Culture Center. We have 210 monthly employees and pay \$1,485,000 annually into the Hotel Tax Fund. We suggest that no project in this immediate neighborhood be approved which requires a zoning variance which would either require the support of parking and loading facilities or substantially alter the character of this very important part of the city of San Francisco.

" a public garage entering and exiting on Jackson Street is:

4. Not a cost effective part of development. (The public demand will not support this difficult entry/exit garage sufficiently to yield an economic return on the very expensive below grade cost of construction).

"If the Public Garage is necessary to financially support the School and Housing components of this project, I believe the EIR should be supplemented by a market survey. We assume that the Planning Department would want to be assured that its approval of this process does not jeopardize the solvency of the School or the Housing Corporation." (Harold Moose, Justice Investors)

Response

The proposed project would not require a zoning variance. The SDEIR describes the approval requirements for the project on pages 40 to 43. The project would require Conditional Use Authorization for the community commercial garage on Site A (*City Planning Code* Sections 812.57 and 890.10) and to provide valet parking on Site B, and would require modification for not providing a loading dock on either Site A or Site B.

The proposed affordable senior housing and the St. Mary's Chinese Catholic Center are not designed as for-profit developments. The funding for the housing and the school/center are independent from the funding of the Site A garage. The garage is not necessary to financially support the housing and school components of the project.

CEQA does not require an analysis of economic aspects of the project such as a market study. The commenter's objections to the project are noted.

Comment

"PROJECT APPROVALS - See Summary (top of page 6); Project Description: Approvals Required (pages 40 and 43). Role of the Landmarks Preservation Advisory Board is not mentioned or is not consistent throughout. There is no mention of the reviews required by Section 106 of the National Historic Preservation Act, a significant omission." (Gee Gee Platt, G. Bland Platt Associates)

Response

On page 43 of the SDEIR, reference is made to the advisory role of the Landmarks Preservation Advisory Board (LPAB). This role entails review of the proposed project and their recommendations to the City Planning Commission with respect to historic

architectural resources. As noted in the response on page C&R 46, a discussion of the Section 106 process is added to the SDEIR for informational purposes.

Comment

"DPW UNOBSTRUCTED CORRIDOR - See Summary (page 6); Description (page 42). Please explain this feature in sufficient detail to allow the layman to understand what this means in terms of the projects?" (Gee Gee Platt, G. Bland Platt Associates)

Response

The reference to the Department of Public Works' requirement for a below grade utility corridor under the sidewalks on Columbus Avenue and Jackson, Washington and Kearny Streets is found on pages 6 and 42 in the SDEIR. For both Site A and Site B, the parking garage would extend under the sidewalks. The Public Works Department requires that a corridor at least four feet wide and ten feet deep (from the street curb) be maintained under the sidewalks to allow for utilities. Thus, the first level of the below-grade parking garage must allow for this utility corridor.

NOTIFICATION

Comment

"I'm very concerned about the failure to notify business owners in the immediate area of the progress of 94.615E. The Telegraph Hill Dwellers were notified and given a history of the project, while the Jackson Square merchants were left with very little or no notice. It seems if you don't own your building where you have your business, you are not a part of the planning notification process. It seems somewhat out of character when comparing San Francisco's tight residential notification requirements used in the neighborhood when even remodeling your garage requires notification of your neighbors even if they rent. (William Stout, William Stout Architectural Books)

Response

The notification process for the public followed the Planning Department's normal procedures and CEQA requirements. All adjacent property owners are notified about the project and that an EIR is being prepared. The Department's standard distribution list, found in Chapter IX in the SDEIR (pages 131 to 140), was used to send copies of the

SDEIR to government agencies, groups and individuals, media, libraries, and adjacent property owners. In addition, other groups and individuals, and adjacent property owners and tenants were notified that the SDEIR was available at the Planning Department. Public notices of the availability of the SDEIR and the public hearing were published in the Independent Newspaper and posted at eight different locations around the project site. Conditional Use Authorization requires notification of property owners within a 300-foot radius of the project site. Generally, businesses are not notified unless they represent an organized group (e.g. Chinatown Merchants Association) and are on the Department's Neighborhood Organizations and Service Agencies list or are adjacent tenants to the project site. The Department's policy is to make the SDEIR available to any interested party and it regrets any perceived oversight in notification.

Comment

"Organizations and Persons Consulted - Pages 129 and 130. Why are the following not listed here: California Office of Historic Preservation, the Foundation for San Francisco's Architectural Heritage, [and] Mrs. Anne Bloomfield?" (Gee Gee Platt, G. Bland Platt Associates)

Response

The three parties noted in the comment were consulted during the preparation of the SDEIR and will be added to the list.

The following will be added to the SDEIR on page 130 under "Others":

"California Office of Historic Preservation

"Foundation for San Francisco's Architectural Heritage

"Anne Bloomfield"

Comment

"Distribution List. With the exception of Heritage and the Landmarks Board, members of the Historic Preservation community were excluded from the initial distribution list. In the past, such individuals were routinely included when a project contained an historic building. Please return my name to the distribution list under such circumstances." (Gee Gee Platt, G. Bland Platt Associates)

Response

The commenter's name and address will be added to the distribution list.

On page 134 of the SDEIR, add the following:

"G. Bland Platt
362 Ewing Terrace
San Francisco, CA 94118"

FORMAT

Comment

"PHOTOGRAPHS/PHOTOMONTAGES - Photographs are generally not well marked to orient the reader. Addition of a North arrow would help, as would inclusion of street names on a consistent basis.

"Using a map, such as Figure 1 on page 23, to show position of photographer and direction of photograph would be helpful.

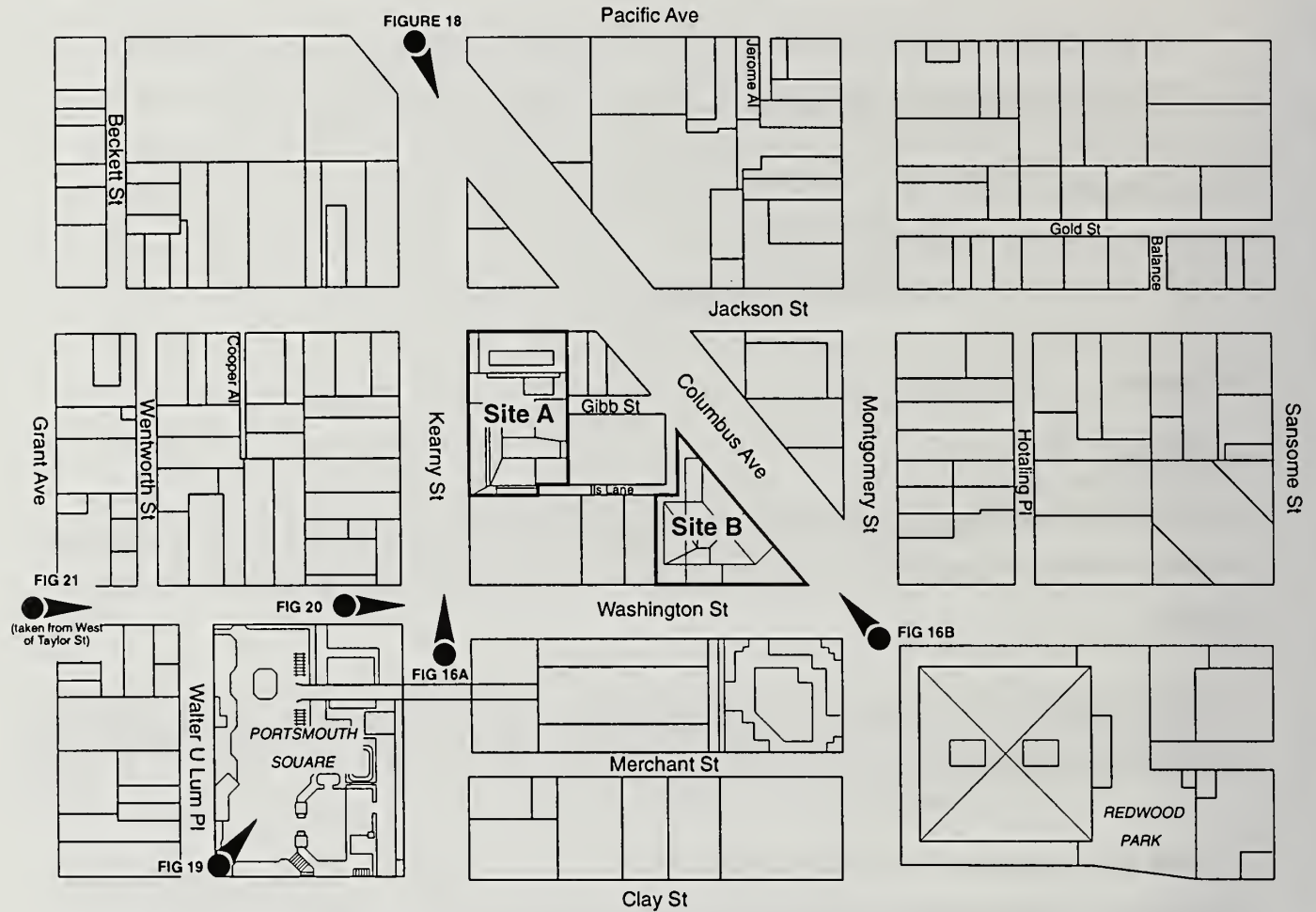
"Please add dotted lines or other devices around new construction in photomontages to assist the reader's understanding. See Figures 18 to 21 on pages 68 to 71." (Gee Gee Platt, G. Bland Platt Associates)

Response

Figure C&R 6, Location of Photos and Photomontages, is found on page C&R.68. It shows the location of where the photographs were taken and the direction of view. In addition, the photomontages in the SDEIR (Figures 18, 19, 20 and 21, pages 68 to 71) have been revised to identify the proposed project buildings on Site A and Site B, and are found on pages C&R.69 through C&R.72.

Comment

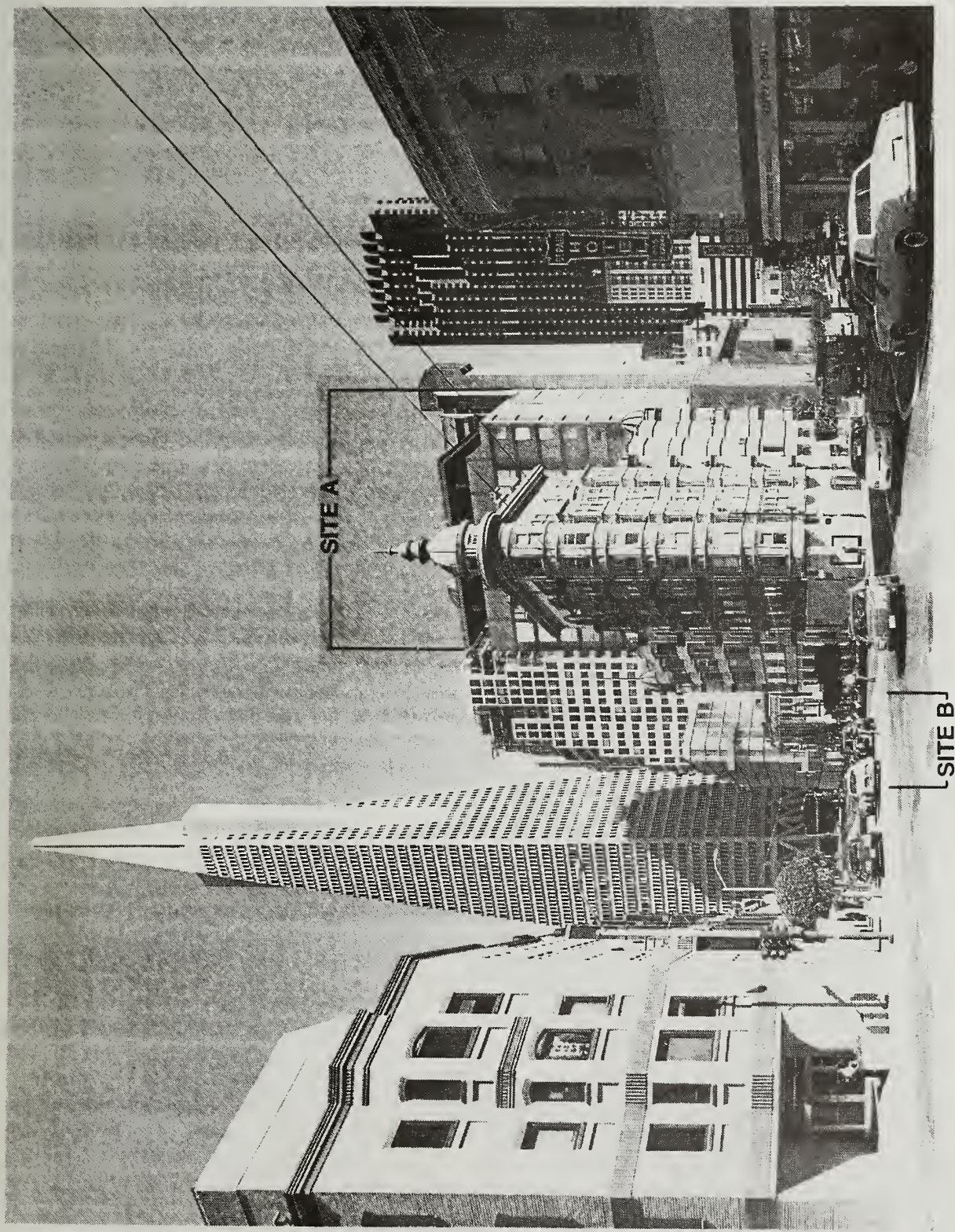
"In the Draft EIR, one has to wade all the way to page 114 before finding out that the Project does have an unavoidable significant adverse impact, namely the demolition of the Colombo Building. This information should be called out at the beginning of the report, specifically in the Summary of Main Environmental Effects on page 8." (Anne B. Bloomfield, Architectural History)



Source: During Associates after ESA

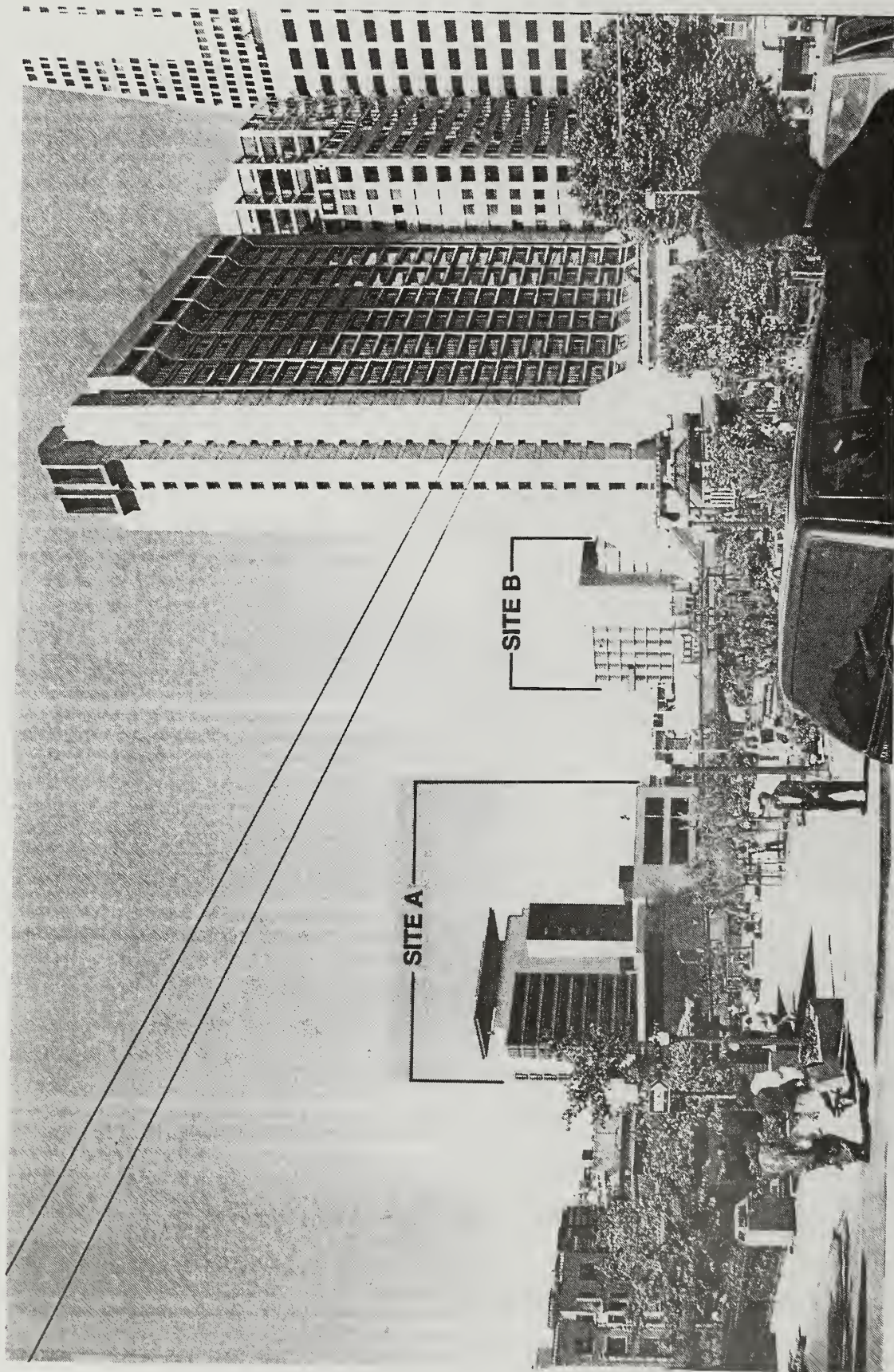


LOCATION OF SITE PHOTOS AND PHOTOMONTAGES C&R FIGURE 6



Source: Square One Productions

PHOTOMONTAGE OF SITES A AND B FROM COLUMBUS/KEARNY
FIGURE 18
(REVISED)



**PHOTOMONTAGE FROM SOUTHWEST CORNER OF PORTSMOUTH SQUARE
AT CLAY STREET AND WALTER U LUM PLACE
(REVISED)**

Source: Square One Productions



PHOTOMONTAGE OF SITE B FROM WEST OF KEARNY/WASHINGTON
(REVISED) **FIGURE 20**

source Square One Productions



Source: Square One Productions

PHOTOMONTAGE FROM NOB HILL FIGURE 21 (REVISED)

Response

On page 1 of the SDEIR, reference is made to the fact that CEQA was revised in 1992 to establish a presumption that demolition or substantial change in an historic resource is a significant environmental effect, requiring preparation of an EIR. One of the reasons that the SDEIR is being prepared is to analyze the historic significance of demolition of the Colombo Building. On page 8 of the SDEIR, the statement is made that the project would require the demolition of the Colombo Building which is a historic building.

Comment

"ISSUES TO BE RESOLVED - Summary (page 20). What is the purpose of this section?" (Gee Gee Platt, G. Bland Platt Associates)

Response

The section referenced by the commenter is required under CEQA Guidelines Section 15123, which states that the summary of an EIR should identify issues to be resolved including the choice among alternatives. The Planning Department includes this section in the Summary to identify to the reader the issues to be resolved with respect to the proposed project, which are the demolition of the Colombo Building and the relationship of the project, including the design of the buildings, to Chinatown and the Jackson Square Historic District.

D. STAFF-INITIATED CHANGES AND ERRATA

Page 1, second paragraph, line 4, change "Resources" to "Places."

Page 5, top of page, line 1, add "below ground-level parking" between "contains" and "ground-floor."

Page 6, after the fourth bullet item, add:

- The Department of Public Works' Bureau of Streets and Sidewalks and the Board of Supervisors must review and approve the school drop-off curb cut on Kearny Street for Site A."

Page 42, first bullet item, delete lines 3, 4, and the sentence ending on line 5.

Page 42, second bullet item, delete "151(j)" and add "155(j)", and delete "161(a)" and add "161(c)."

Page 42, third regular paragraph, lines 3 and 4, revise the last sentence to read:

"The encroachment permit would be reviewed by the Department of Building Inspection for conformity to issued by the Department of Public Works' requirements after review by the Department of Building Inspection."

Page 43, after the last full paragraph, add:

"The Department of Public Works' Bureau of Streets and Sidewalks and the Board of Supervisors must review and approve the school drop-off curb cut on Kearny Street for Site A."

Page 51, first full paragraph, line 2, change "west" to "east."

Page 66, first paragraph, line 6, change "151(j)" to "155(j)."

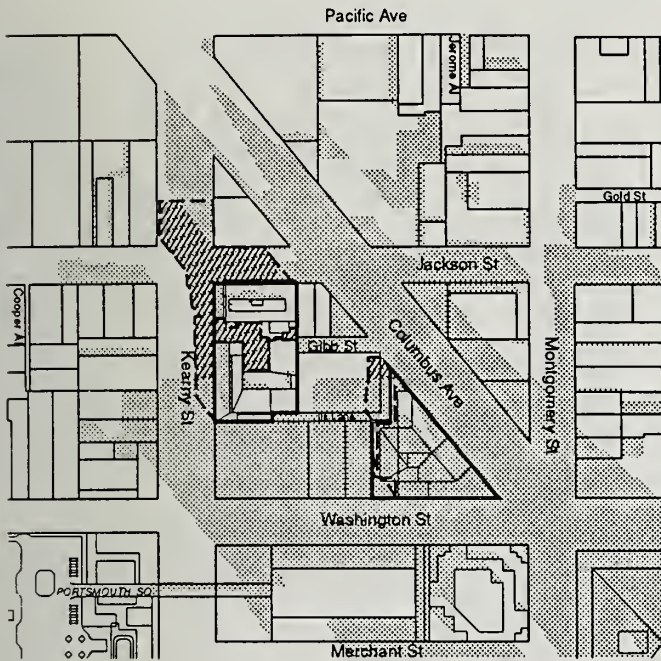
Page 72, 74, 75 and 76, replace the Figures 22, 23, 24, and 25 follow this page on pages C&R.75 through C&R.78.

Page 107, first main heading, add "**HISTORIC, ARCHITECTURAL AND**" before "**CULTURAL RESOURCES**."

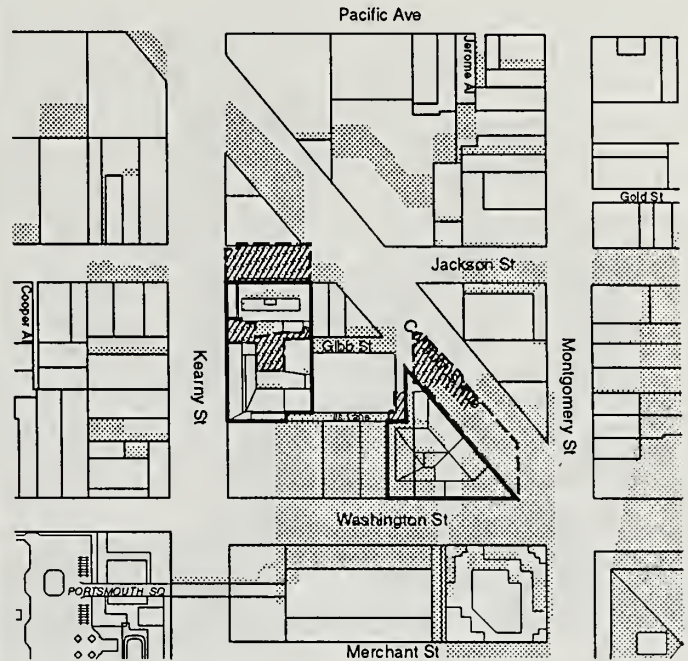
Page 128, under Project Sponsors, add under Site A:

"Kearny Street Housing Corporation
c/o 1670 Pine Street, First Floor
San Francisco, CA 94109
Victor Seeto, Treasurer"

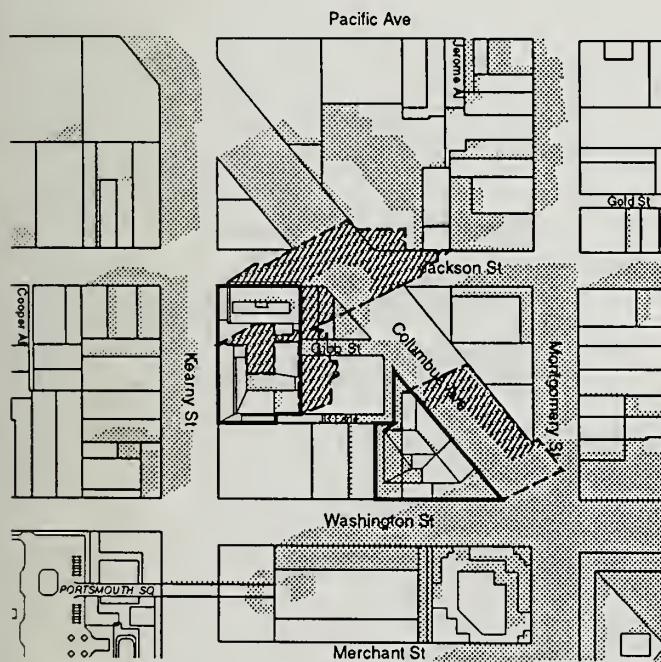
Page 129, under "City and County of San Francisco," change "Niel" to "Neil" and "Marc" to "Mark."



10:00 AM PDT





12:00 NOON PDT



3:00 PM PDT

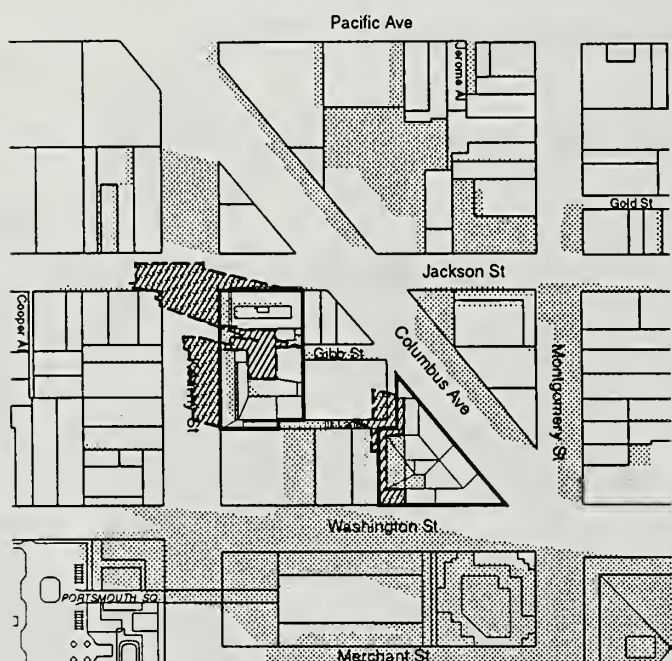
LEGEND

- Project Shadow
-  Shadow from existing building
-  Net new shadow from project

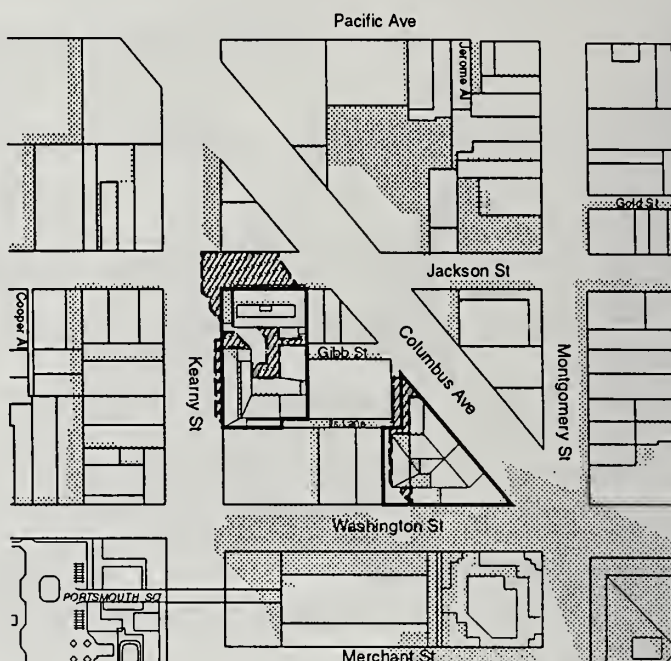


Source: During Associates and ESA

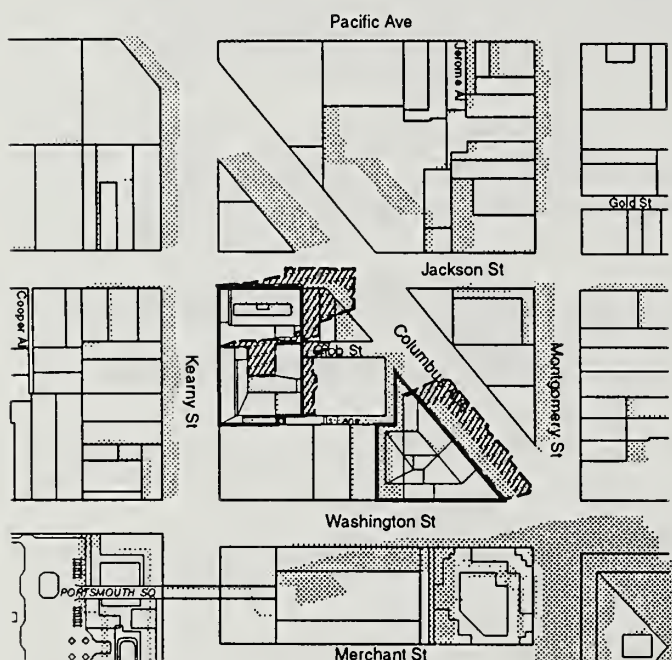
PROJECT SHADOW PATTERNS—MARCH 21 FIGURE 22 (REVISED)



10:00 AM PDT



12:00 NOON PDT



3:00 PM PDT

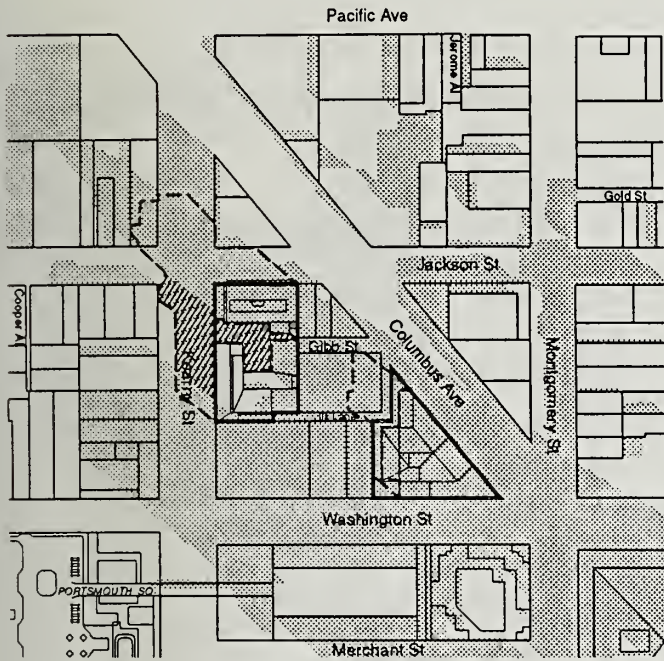
LEGEND

- Project Shadow
- Shadow from existing building
- ▨ Net new shadow from project

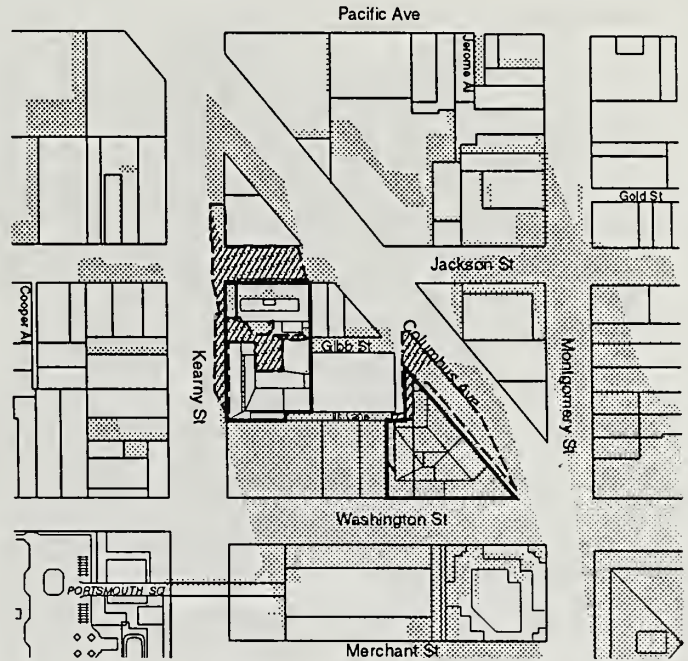


Source: During Associates and ESA

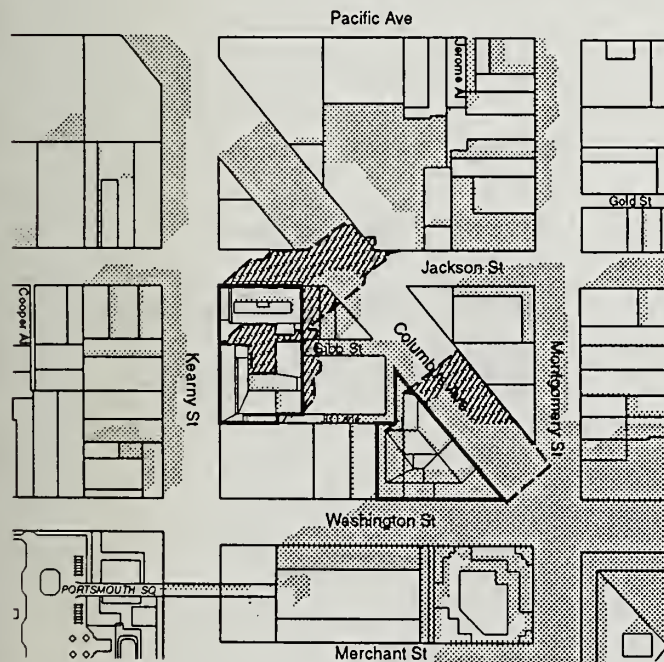
PROJECT SHADOW PATTERNS—JUNE 21 **FIGURE 23**
(REVISED)



10:00 AM PDT





12:00 NOON PDT



3:00 PM PDT

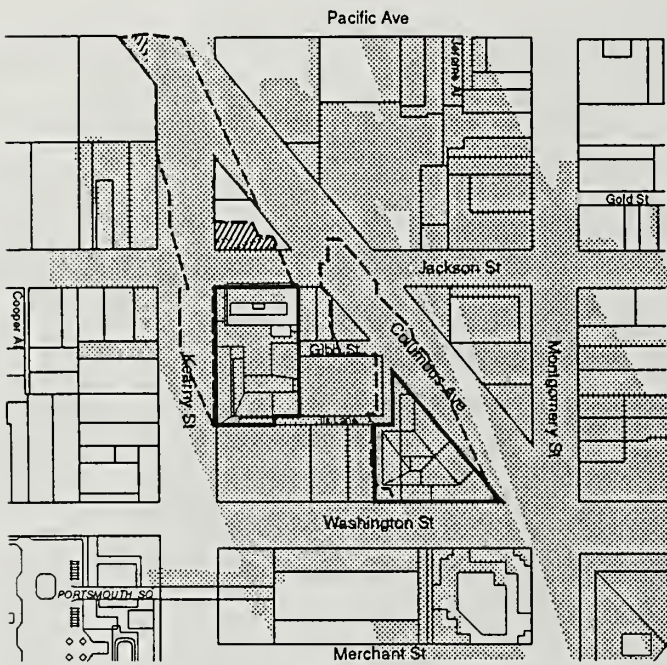
LEGEND

- Project Shadow
-  Shadow from existing building
-  Net new shadow from project

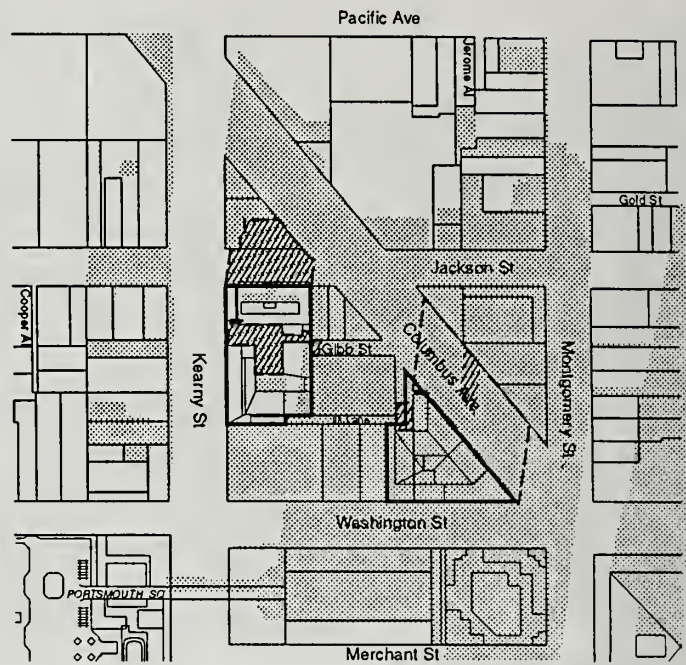


Source: During Associates and ESA

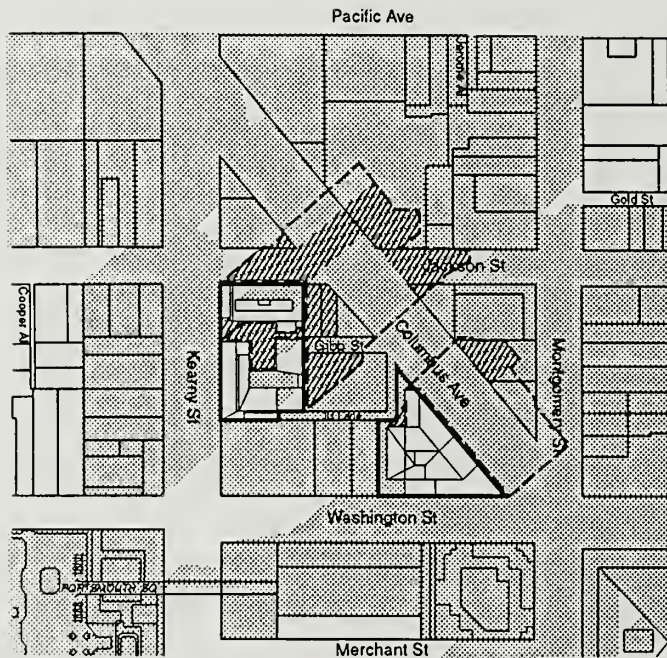
PROJECT SHADOW PATTERNS—SEPTEMBER 21 FIGURE 24 (REVISED)



10:00 AM PDT



12:00 NOON PDT



3:00 PM PDT

LEGEND

- Project Shadow
- Shadow from existing building
- ▨ Net new shadow from project



Source: During Associates and ESA

PROJECT SHADOW PATTERNS—DECEMBER 21 FIGURE 25 (REVISED)

C&R APPENDIX
Historic Resources Inventory and
Kearny Street/Columbus Avenue Project Zone of Influence Matrix

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION

HISTORIC RESOURCES INVENTORY

IDENTIFICATION AND LOCATION

1. Historic name Lock Kum Shu Building
- * 2. Common or current name _____
- * 3. Number & street 642-644 Washington Street Cross-corridor Columbus Avenue
City San Francisco Vicinity only _____ Zip 94111 County San Francisco
4. UTM zone _____ A _____ B _____ C _____ D _____
5. Quad map No. _____ Parcel No. 195/7 Other _____

Ser. No. _____
National Register status _____
Local designation _____

DESCRIPTION

6. Property category Building If district, number of documented resources _____
- * 7. Briefly describe the present physical appearance of the property, including condition, boundaries, related features, surroundings, and (if appropriate) architectural style.

This 1907 two-story building is divided vertically by a simple entablature above the first level that has been partially hidden by a fire escape which is a succeeding addition. The three second-story double-hung windows are surmounted by a continuous lintel that is actually a part of the upper Ionic entablature. The storefront has been infilled with concrete block above which the original tripartite transom remains.

The building is used for commercial and residential (loft space) functions.

The building is made of reinforced concrete with galvanized iron cornices. Excepting the storefront alterations and some physical damage, the building is in fair condition. The building sits along the sidewalk edge with a lot size of about 13' x 100'.



8. Planning agency _____
9. Owner & address
Mr. & Mrs. Andrew Ow
642 Washington St.
San Francisco, CA 94111
10. Type of ownership private
11. Present use Store/Loft Apt.
12. Zoning CCB
13. Threats None known

4296-0001

Construction date(s) 1907 Original location 642-644 Washington Street Date moved N/A

Alterations & date Storefront

Architect Otto F. Schiller Builder Hjul

Historic attributes (with number from list) HP-3 (multiple family property)
HP-6 (1-3 story commercial building)

Context for evaluation: Theme Architecture Area San Francisco

Period post-1906 Property type earthquake Context formally developed? Commercial Development

Briefly discuss the property's importance within the context. Use historical and architectural analysis as appropriate. Compare with similar properties.

This two-story building is similar to many of the two to three-story buildings in the area. It has a typical Classical Revival style and storefront facade. The building was constructed after the 1906 earthquake and relates, in scale and style, to the buildings on the block and in the adjacent historic district of Jackson Square.

San Francisco Downtown Inventory Evaluation Sheet
 Foundation for San Francisco's Architectural Heritage:
 -Research & Field Survey Forms-Bldgs

Applicable National Register criteria C

Other recognition

State Landmark No. (if applicable)

Evaluator J. Gordon Turnbull, FAIA

Date of evaluation November 1996

Survey type

Survey name

Year form prepared 1996

By (name)

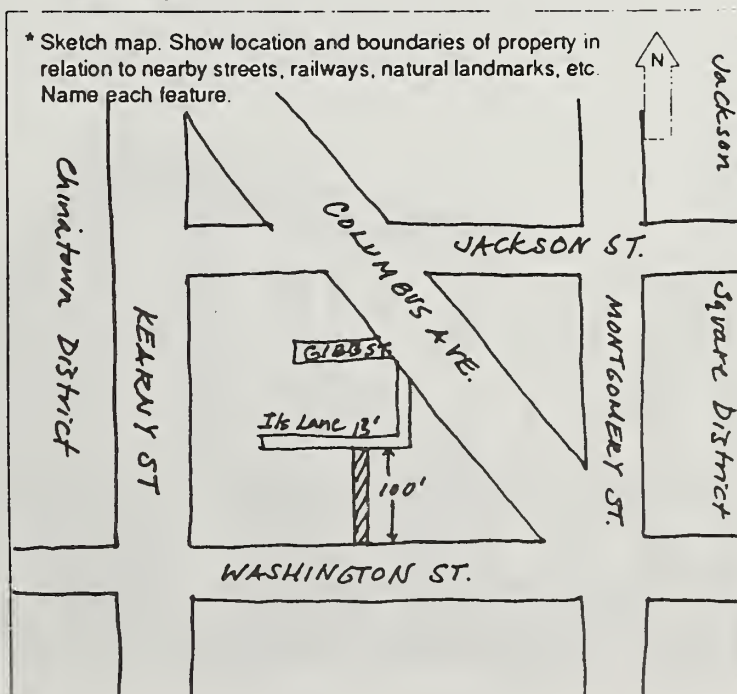
Organization Page & Turnbull, Inc.

Address 724 Pine Street

City & Zip San Francisco 94108

Phone (415) 362-5154

* Sketch map. Show location and boundaries of property in relation to nearby streets, railways, natural landmarks, etc. Name each feature.



State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION

HISTORIC RESOURCES INVENTORY

IDENTIFICATION AND LOCATION

1. Historic name John G. Ils Hotel
- * 2. Common or current name John G. Ils Apartments
- * 3. Number & street 53-55 Columbus Avenue Cross-corridor Jackson Street
City San Francisco Vicinity only _____ Zip 94111 County San Francisco
4. UTM zone _____ A _____ B _____ C _____ D _____
5. Quad map No. _____ Parcel No. 195/12 Other _____

Ser. No. _____
National Register status _____
Local designation _____

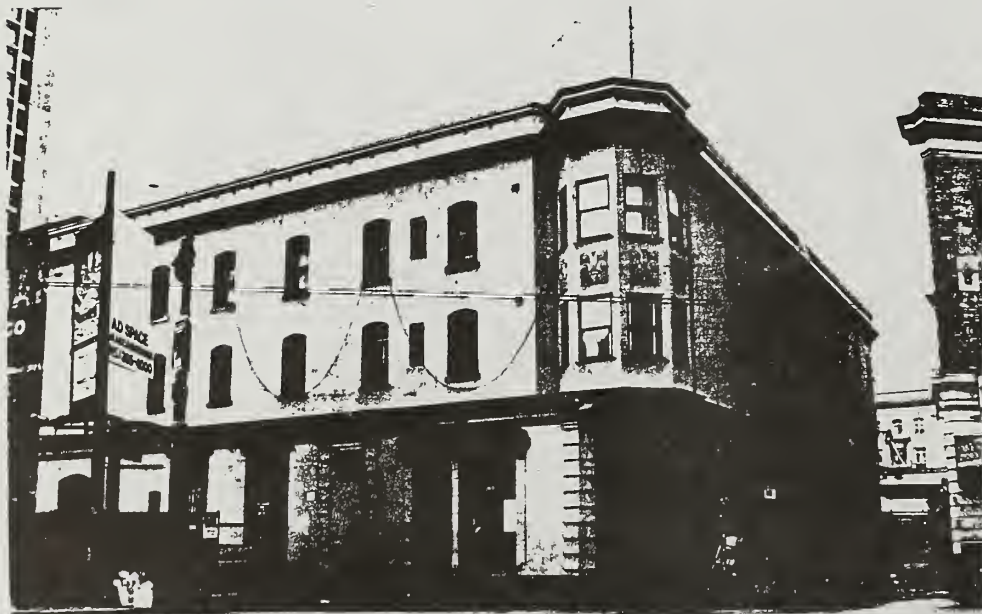
DESCRIPTION

6. Property category Building If district, number of documented resources _____
- * 7. Briefly describe the present physical appearance of the property, including condition, boundaries, related features, surroundings, and (if appropriate) architectural style.

This 1910 building sits at the crossing of two minor streets and Columbus Avenue, expressing this meeting with an octagonal corner. The three-story building has a commercial function but is also a large residential complex. The corner piece projects beyond the first floor flattened corner and the second and third levels are separated by decorative panels. The building is divided horizontally by the first level entablature and the cornice that tops the third level, a typical characteristic of the buildings in the area. Above this cornice rises a parapet finished with a simple cornice treatment. The double-hung windows of the projecting octagonal corner, on the upper levels, are rectangular in contrast to the segmental arch openings of the inset double-hung windows on the rest of the building. The inset doors have wooden surrounds and some openings are surmounted by a galvanized iron lintel. The corner storefront has two transom windows that meet at the corner. On the first level, brick pilasters divide the building into irregular bays.

The building was constructed with brick and finished with stucco. The cornices are made of galvanized iron.

The corner of the building projects onto the street edge and the entire building covers an area of about 75' x 106'.



8. Planning agency _____

9. Owner & address

Fong NY Enterprise of Cal Inc
55 Columbus Ave.
San Francisco, CA 94111

10. Type of ownership private
11. Present use Residence/
Commercial
12. Zoning CRNC
13. Threats None known

94296-0001

Construction date(s) 1910 Original location 53-55 Columbus Avenue Date moved N/A

Alterations & date Remodeled 1939

Architect Fabre and Mohr Builder Unknown

Historic attributes (with number from list) HP-3 (multiple family property)
HP-6 (1-3 story commercial building)

Context for evaluation: Theme Architecture Area San Francisco

Period post-1906 earthquake Property type Context formally developed? Commercial Development

Briefly discuss the property's importance within the context. Use historical and architectural analysis as appropriate. Compare with similar properties

The building was constructed after the 1906 earthquake during a time of great urban renewal. The Classical Revival style of the building is not atypical for the area, but its unusual site allows the corner to face onto Columbus Avenue. Although the octagonal corner is matched by other corner buildings in the area, the building is unique in that most of the facade does not front on Columbus Avenue as other facades do. The pilasters on the first level are irregularly spaced and their brick banding gives the building texture. The banding of the cornice above the first level and another above the third is a common feature of the area.

Sources
 San Francisco Downtown Inventory Evaluation Sheet
 Foundation for San Francisco's Architectural Heritage:
 -Research & Field Survey Forms-Bldgs
 North Beach Historical Survey (1981)
 Applicable National Register criteria C

Other recognition
 State Landmark No (if applicable)

1. Evaluator J. Gordon Turnbull, FAIA
 Date of evaluation November 1996

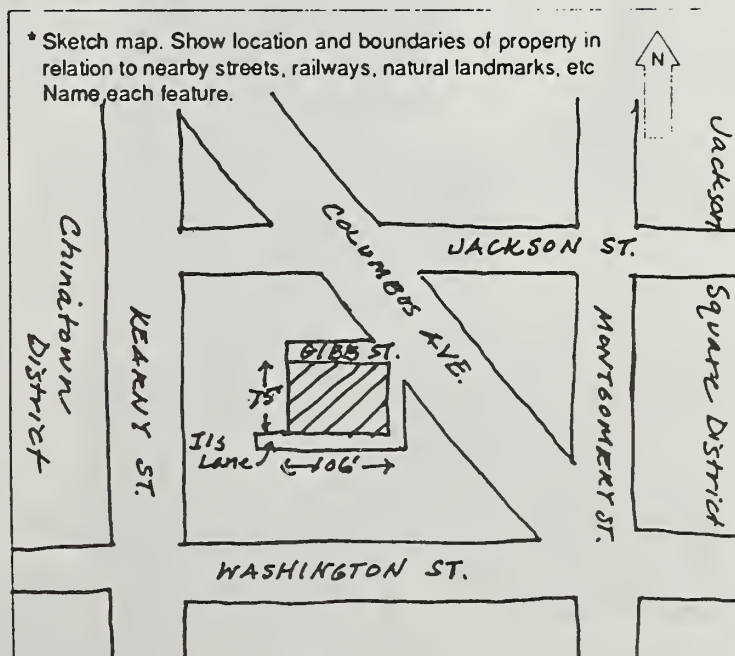
2. Survey type

3. Survey name

4. Year form prepared 1996

By (name)
 Organization Page & Turnbull, Inc.
 Address 724 Pine Street
 City & Zip San Francisco 94108
 Phone (415) 362-5154

* Sketch map. Show location and boundaries of property in relation to nearby streets, railways, natural landmarks, etc. Name each feature.



State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION

HISTORIC RESOURCES INVENTORY

IDENTIFICATION AND LOCATION

1. Historic name Charlotte Prince Building
- * 2. Common or current name _____
- * 3. Number & street 636-640 Washington Street Cross-corridor Columbus Avenue
City San Francisco Vicinity only _____ Zip 94111 County San Francisco
4. UTM zone A B _____ C _____ D _____
5. Quad map No. _____ Parcel No. 195/6 Other _____

Ser. No. _____
National Register status _____
Local designation _____

DESCRIPTION

6. Property category Building If district, number of documented resources _____
- * 7. Briefly describe the present physical appearance of the property, including condition, boundaries, related features, surroundings, and (if appropriate) architectural style.

This building, constructed in 1908, has a commercial storefront and residential spaces on the upper levels. The three-story structure is topped with a projecting box cornice supported by five brackets and decorated with nine rosettes along the frieze. A short parapet rises above the cornice. The two-bay system is made of two sets of coupled windows on the second and third floor separated by an embossed panel. The sills of the second floor windows rest on a pedestal-like piece surmounting an elongated panel supported by brackets on either end of the storefront opening at street level.

The building is brick with brick voussoirs over the third-story windows. The cornice, panels, and brackets are made of galvanized iron. The storefront has been altered with a large sign and newer materials. Some vandalism is apparent and a fire escape obscures the right side but the building is in good condition.

The building fronts on the sidewalk edge and covers an area of 20' x 100'.



8. Planning agency _____
9. Owner & address
Myland K. and Melinda K. Hu
160 Valparaiso St.
San Francisco, CA 94133
10. Type of ownership Private
11. Present use Residential/
Commercial
12. Zoning CCB
13. Threats None known

94296 0001

RICAL INFORMATION

Construction date(s) 1908 Original location 636-640 Washington Street Date moved N/A

Alterations & date Painted brick, storefront

Architect Sylvain Schnaittacher Builder Unknown

Historic attributes (with number from list) HP-3 (multiple family property)
HP-6 (1-3 story commercial building)

ICANCE AND EVALUATION

Context for evaluation: Theme Architecture Area San Francisco

Period post-1906 Property type Earthquake Context formally developed? Commercial Development

Briefly discuss the property's importance within the context. Use historical and architectural analysis as appropriate. Compare with similar properties.

The building was constructed after the 1906 earthquake in a period of great urban renewal. The distinguishing features of this building are its upper cornice and simple decorative brackets. The cornice is box shaped and sits on brackets projecting from the wall surface. The building was designed in the Classical Revival tradition, has a storefront, and the facade is divided horizontally by the upper cornice and panel above the storefront. These are typical features of the buildings in this area.

Sources
 San Francisco Downtown Inventory Evaluation Sheet
 Foundation for San Francisco's Architectural Heritage:
 -Research & Field Survey Forms-Bldgs

Applicable National Register criteria C

Other recognition _____

State Landmark No (if applicable) _____

Evaluator J. Gordon Turnbull, FAIA

Date of evaluation November 1996

Survey type _____

Survey name _____

Year form prepared 1996

By (name) _____

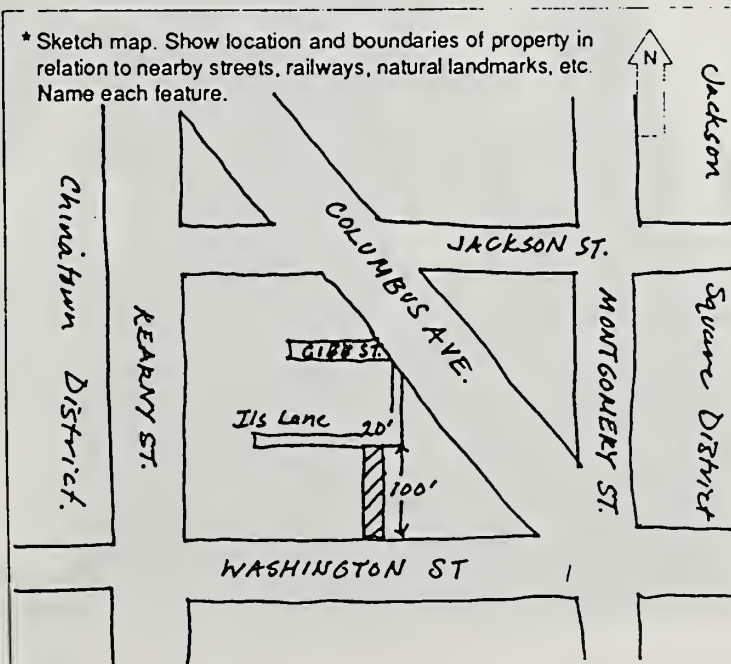
Organization Page & Turnbull, Inc.

Address 724 Pine Street

City & Zip San Francisco 94108

Phone (415) 362-5154

* Sketch map. Show location and boundaries of property in relation to nearby streets, railways, natural landmarks, etc. Name each feature.



State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION

HISTORIC RESOURCES INVENTORY

IDENTIFICATION AND LOCATION

1. Historic name _____
- * 2. Common or current name _____
- * 3. Number & street 533-535 Jackson Street Cross-corridor Columbus Avenue
City San Francisco Vicinity only _____ Zip 94111 County San Francisco
4. UTM zone A B C D
5. Quad map No. _____ Parcel No. 195/14 Other _____

Ser. No. _____
National Register status _____
Local designation _____

DESCRIPTION

6. Property category Building If district, number of documented resources _____
- * 7. Briefly describe the present physical appearance of the property, including condition, boundaries, related features, surroundings, and (if appropriate) architectural style.

This three-story commercial/residential building was constructed in 1908. The storefront entrance has been altered or covered with wood paneling. A galvanized iron panel surmounts the storefront. The two-bay system is made of two windows on each level. The windows have segmental arches made of brick and simple brick sills. Metal casement windows have replaced the original type. The upper cornice projects from the flat facade and is supported by a bracket on either end. A small parapet rises above the cornice.

The building was constructed mainly of brick with a galvanized iron cornice and storefront panel.

The building advances on the property line and covers an area of about 22' x 68'.



8. Planning agency _____
9. Owner & address
Gary Chan
1046 Skyline Drive
Daly City, CA
10. Type of ownership Private
11. Present use Residential/
Commercial
12. Zoning CRNC
13. Threats None known

94296-0001

HISTORICAL INFORMATION

1 Construction date(s) 1910 Original location 533-535 Jackson Street Date moved N/A

5 Alterations & date Storefront, windows

3 Architect Unknown Builder Unknown

7 Historic attributes (with number from list) HP-3 (multiple family property)
HP-6 (1-3 story commercial building)

SIGNIFICANCE AND EVALUATION

3 Context for evaluation: Theme Architecture Area San Francisco

Period post-1906 Property type earthquake Context formally developed? Commercial Development

9 Briefly discuss the property's importance within the context. Use historical and architectural analysis as appropriate. Compare with similar properties

The building was constructed after the 1906 earthquake in a period of great urban renewal. The building's simplicity is embellished only by its cornice with its two supportive brackets. The Classical style and scale of the building relate to the two to three-story buildings in the area.

20 Sources North Beach Historical Survey (1981)
San Francisco Downtown Inventory Evaluation Sheet
Foundation for San Francisco's Architectural Heritage:

- Research Form-Buildings
- Field Survey Form-Buildings

21 Applicable National Register criteria C

22 Other recognition _____
 State Landmark No. (if applicable) _____

23 Evaluator J. Gordon Turnbull, FAIA
 Date of evaluation November 1996

24 Survey type _____

25 Survey name _____

26 Year form prepared 1996
 By (name) _____
 Organization Page & Turnbull, Inc.
 Address 724 Pine Street
 City & Zip San Francisco 94108
 Phone (415) 362-5154

* Sketch map. Show location and boundaries of property in relation to nearby streets, railways, natural landmarks, etc. Name each feature.



State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION

HISTORIC RESOURCES INVENTORY

IDENTIFICATION AND LOCATION

1. Historic name Davidson Bros. Building
- * 2. Common or current name _____
- * 3. Number & street 646-654 Washington Street Cross-corridor Columbus Avenue
City San Francisco Vicinity only _____ Zip 94111 County San Francisco
4. UTM zone A B C D
5. Quad map No. _____ Parcel No. 195/8 Other _____

Ser. No. _____
National Register status _____
Local designation _____

DESCRIPTION

6. Property category Building If district, number of documented resources _____
- * 7. Briefly describe the present physical appearance of the property, including condition, boundaries, related features, surroundings, and (if appropriate) architectural style.

This 1909 three-story building is divided into three bays. The central bay dominates with three separate windows; the flanking bays have coupled windows, all double-hung. The first and second level have horizontal and vertical bands of ornamental rectilinear tiles with intricate detailing that have been described as "Byzantine" in a 1909 newspaper article. On the first level, the central opening has an adjacent window and is flanked by a secondary doorway and a garage entrance.

The building has been altered extensively, including infilling of the storefront on the first floor and removal of many decorative elements. The windows flanking the central window on the second floor have been filled with concrete block. The sills of the upper level windows have been removed and the space filled with concrete. The most distinct of the remaining elements are the lion head brackets which are surmounted with elements suggesting three-sided battlements projecting from the flat facade. The wooden surround of the central door and window and secondary doorway are not original. A vertical lighted sign has been attached on the left side of the upper levels and a fire escape has been added on the right side. An awning has been placed over the central doorway.

The building is made of brick and the decorative tiles and lion head brackets are of cast stone. Considering the changes made, the building is in fair condition. The building fronts on the sidewalk along the street and the lot size is approximately 48' x 100'.



8. Planning agency _____
9. Owner & address
Tam Family Investment Co. Inc.
947 Grant Ave.
San Francisco, CA 94108
10. Type of ownership Private
11. Present use Residential/
Commercial
12. Zoning CCB
13. Threats None known

A 94296-0001

HISTORICAL INFORMATION

- *14. Construction date(s) 1909 Original location 646-654 Washington Street Date moved N/A
15. Alterations & date Storefront, detail, windows
16. Architect George A. Dodge Builder
17. Historic attributes (with number from list) HP-3 (multiple family property)
HP-6 (1-3 story commercial building)

SIGNIFICANCE AND EVALUATION

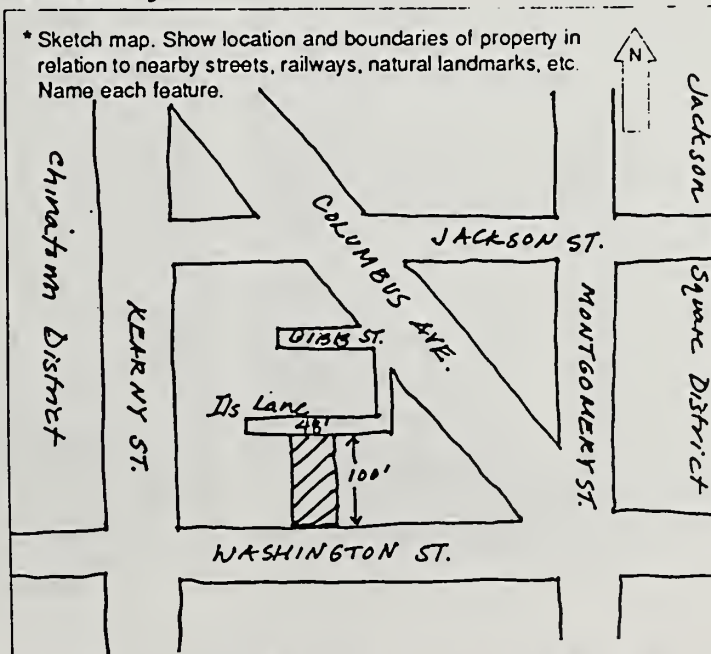
18. Context for evaluation: Theme Architecture Area San Francisco
 Period post-1906 Property type Context formally developed? Commercial
earthquake Development
- *19. Briefly discuss the property's importance within the context. Use historical and architectural analysis as appropriate. Compare with similar properties.

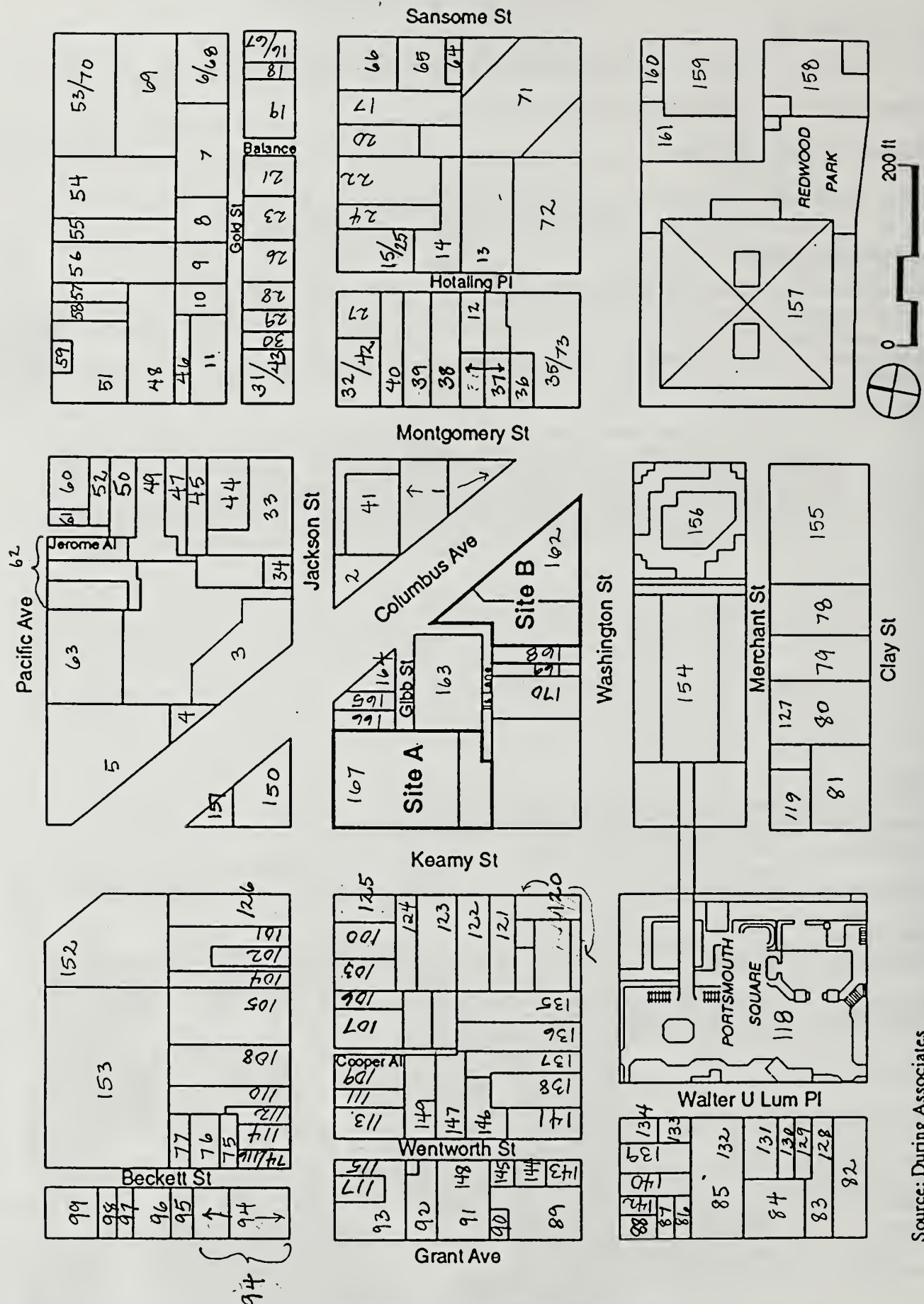
This building was constructed after the 1906 earthquake and is atypical of the buildings in the area. Although the brick construction is a typical characteristic of the area, the unusual use of cast stone tiles on the facade and the lion head brackets supporting "battlements" are eccentric when compared to the Classical style of adjacent buildings. This style has been described as "Byzantine" and "Sullivan-esque". This building does adhere to the typical height of the neighboring buildings of two to three-stories with storefronts.

Sources

San Francisco Downtown Inventory Evaluation Sheet
 Foundation for San Francisco's Architectural Heritage:
 -Research & Field Survey Forms-Bldgs

21. Applicable National Register criteria C
22. Other recognition
 State Landmark No. (if applicable)
23. Evaluator J. Gordon Turnbull, FAIA
 Date of evaluation November 1996
24. Survey type
25. Survey name
- *26. Year form prepared 1996
 By (name)
 Organization Page & Turnbull, Inc.
 Address 724 Pine Street
 City & Zip San Francisco 94108
 Phone (415) 362-5154





KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

		Assessor's Block No. / Lot No.	San Francisco Dept. of City Planning: Inventory	Local Landmark	Foundation for San Francisco's Architectural Heritage	California Inventory of Historic Resources / State Register	National Register of Historic Places	Proposed Chinatown Historic District	Jackson Square Historic District (National Register of Historic Places)	North Beach Survey	
1	Columbus Tower (Sentinel Building)	176/13	5	x	A	x	3S		x	x	
2	800-804 Montgomery St	175/12	4	x		x	1D/7L		x		
3	468-470 Jackson St	175/10p		x		x	1D		x		
4	472 Jackson St	175/10p	4	x		x	1D		x		
5	458-60 Jackson St	175/9		x		x	1D		x		
6	432-436 Jackson St	175/7	3	x		x	1D		x		
7	400 Jackson St	175/4	2	x		x	1D		x		
8	463-473 Jackson St	196/17	5	x		x	1D		x		
9	451-455 Jackson St	196/19	5	x		x	1D		x		
10	443-445 Jackson St	196/20	5	x		x	1D		x		
11	435-441 Jackson St	196/21	4	x		x			x		
12	415-431 Jackson St	196/22p	4	x					x		
13	407 Jackson St	196/22p	1	x		x	1D		x		
14	Old Transamerica Bldg (4-36 Columbus Ave)	195/2	4	x					x		
15	726-730 Montgomery St	196/14	3	x		x	7L		x		
16	Belli Bldg (722 Montgomery St)	196/13	4	x		x	1D		x		
17	32-42 Hotaling Pl	196/18	5	x		x	1D		x		
18,20	580-586 Washington St	196/8	3						x		
19	710 Montgomery St	196/10	3						x		
18,20	700 Montgomery St	196/8	3						x		
			3								
			3								
21	Colombo Building (1 Columbus Ave)	195/4	3		B*	x	4S			A	
			3								
			3								
22	833-839 Kearny St	194/3	3		B			C			
23	675-681 Jackson St	194/18	3					NC			
24	924-932 Grant Ave	194/14	3		B	x	4S	C			
25	743 Washington St	209/9	3		A			C			

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

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26	732 Montgomery St (Golden Era Bldg)	196/15		x		x	1D/7L		x		
27	601 Montgomery St (Pony Express Site)	208/26				x	7L				
28	Transamerica Pyramid (Montgomery Block)	207/32				x					
29	505 Sansome St (Niantic Ship/Hotel Site)	207/37				x	x				
30	626-636 Jackson St	177/6			B*			C/a			
31	645-649 Jackson St	194/28	1		B			C/a			
32	661-665 Jackson St/60-68 Wentworth St	194/26			B			C			
33	825 Kearny St	194/5			B			C			
34	17-19 Walter U Lum Pl (Brenham Pl)	209/15			B	x	4S	C/a			
35	21 Walter U Lum Pl (Brenham Pl)	209/14			B	x	4S	C/a			

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

		Assessor's Block No. / Lot No.	San Francisco Dept. of City Planning: Inventory	Local Landmark	Foundation for San Francisco's Architectural Heritage	California Inventory of Historic Resources / State Register	National Register of Historic Places	Proposed Chinatown Historic District	Jackson Square Historic District (National Register of Historic Places)	North Beach Survey	
	JACKSON SQUARE HISTORIC DISTRICT										
1	4-36 Columbus Ave (Old Transamerica Bldg)	195/2	4	x					x		
2	42 Columbus Ave (M)	195/17							x		
3	100-120 Columbus Ave/550-560 Jackson St	176/10							x		
4	124-138 Columbus Ave	176/15							x		
5	170 Columbus Ave	176/16							x		
6	10-14 Gold St/711-729 Sansome St*	175/3							x		
7	40 Gold St	175/32							x		
8	48 Gold St	175/14							x		
9	56 Gold St	175/15				x	1D		x		
10	70 Gold St	175							x		
11	80-90 Gold St/814-820 Montgomery St.	175/16							x		
12	27 Hotaling Pl	196/24							x		
13	30 Hotaling Pl	196/25							x		
14	32-42 Hotaling Pl (Hotaling Stables Building)	196/18	5	x		x	1D		x		
15	60 Hotaling Pl/451-455 Jackson St*	196/19							x		
16	400 Jackson St/701 Sansome St* (Grogan Bldg)	175/4	2	x		x	1D		x		
17	407 Jackson St (Regency House-Ghirardelli Anx)	196/22p	1	x		x	1D		x		
18	408 Jackson St (M)	175/5				x	1D		x		
19	412-414 Jackson St	175/6							x		
20	415-431 Jackson St (Ghirardelli Building)	196/22p	4	x					x		
21	432-436 Jackson St (Yeon Building)	175/7	3	x		x	1D		x		
22	435-441 Jackson St (Medico-Dental Building)	196/21	4	x		x			x		
23	440 Jackson St (R)	175/8				x	1D		x		
24	443-445 Jackson St (Hotaling Annex-East)	196/20	5	x		x	1D		x		
25	451-455 Jackson St/60 Hotaling Pl* (Htlg Bldg)	196/19	5	x		x	1D		x		
26	458-460 Jackson St (Moulinie Building)	175/9		x		x	1D		x		
27	463-473 Jackson St (Hotaling Warehouse West)	196/17	5	x		x	1D		x		

KEARNY STREET / COLUMBUS AVENUE PROJECT
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28	468-470 Jackson St (Solari Building East)	175/10p		x		x	1D		x		
29	472 Jackson St (Solari Building West)	175/10p	4	x		x	1D		x		
30	476-478 Jackson St	175/11							x		
31	494 Jackson St/800 Montgomery St* (Bank)	175/12	4	x		x			x		
32	499 Jackson St/744 Montgomery St(M?)*	196/16							x		
33	500 Jackson St/801 Montgomery St	176/7							x		
34	530-534 Jackson St	176/9				x	4S		x		
35	700 Montgomery St/580 Washington St*	196/8	3	x		x	1D		x		
36	710 Montgomery St	196/10	3						x		
37	712-720 Montgomery St (R)	196/11				x	1D		x		
38	722 Montgomery St (Belli Building)	196/13	4	x		x	1D		x		
39	726-730 Montgomery St (Genella Building)	196/14	3	x		x	7L		x		
40	732 Montgomery St (Golden Era Building)	196/15		x		x	1D/7L				
41	735 Montgomery St	195/1							x		
42	744 Montgomery St/499 Jackson St*	196/16							x		
43	800 Montgomery St/494 Jackson St* (Bank)	175/12	4	x		x	1D/7L		x		
44	807 Montgomery St	176/6							x		
45	809 Montgomery St	176/5							x		
46	824 Montgomery St	175/17							x		
47	831 Montgomery St	176/4							x		
48	836 Montgomery St	175/18							x		
49	843 Montgomery St	176/3A							x		
50	847 Montgomery St	176/3				x	7M		x		
51	850 Montgomery St (R)	175/33							x		
52	855-857 Montgomery St	176/2							x		
53	425 Pacific Ave/755 Sansome St (M)*	175/29							x		
54	435 Pacific Ave	175/28				x	1D/7]		x		
55	451 Pacific Ave (Old Fire House)	175/27							x		
56	Unknown Address	175/26							x		
57	461-463 Pacific Ave	175/25							x		
58	477 Pacific Ave (M)	175/24							x		

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

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59	485 Pacific Ave	175/22							x		
60	501 Pacific Ave (M)	176/1							x		
61	515-517 Pacific Ave	176/23							x		
62	535 Pacific Ave	176/100							x		
63	551-559 Pacific Ave (Old Hippodrome)	176/17				x	1D/7J		x		
64	615 Sansome St	196/3							x		
65	619 Sansome St	196/2							x		
66	Parking Lot	196/1							x		
67	701 Sansome St/400 Jackson St* (Grogan Bldg)	175/4	2	x		x			x		
68	711-729 Sansome St/10-14 Gold St*	175/3							x		
69	731 Sansome St (M?)	175/30							x		
70	755 Sansome St/425 Pacific Ave (M)*	175/29									
71	500 Washington St (M)	196/23							x		
72	520-550 Washington St	196/24				x	1D		x		
73	580-586 Washington St/700 Montgomery St*	196/8	3						x		

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

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	CHINATOWN										
74	4 Beckett St	177/18						x			
75	10 Beckett St	177/19						x			
76	20 Beckett St	177/20			C			C			
77	26-30 Beckett St	177/21			C			C/a			
78	636-640 Clay St/609 Merchant St	208/8			C**			C			
79	646 Clay St	208/9			NR			NC			
80	662-672 Clay St	208/10			C**			C			
81	678-686 Clay St/700-710 Kearny St	208/11						x			
82	760-780 Clay St/800 Grant Ave	209/2			C			C			
83	808-814 Grant Ave	209/3			C			C			
84	824-832 Grant Ave	209/4	2		A	x	4S	C			
85	838 Grant Ave (M)	209/5			NR			NC			
86	848 Grant Ave	209/6			C			C			
87	850 Grant Ave	209/7			C			C			
88	854-864 Grant Ave	209/8			C			C			
89	900-916 Grant Ave/754 Washington St	194/12			C**			C/a			
90	918-920 Grant Ave	194/13	1		C**	x	4S	C			
91	924-932 Grant Ave (930 Grant St)	194/14	3		B	x	4S	C			
92	940-950 Grant Ave	194/15			C**			C/a			
93	954-960 Grant Ave/699 Jackson St	194/16						x			
94	1000-1022 Grant Ave/672 Jackson St	177/12,13			C**			C			
95	1024-1026 Grant Ave	177/14			C			C			
96	1040-1042 Grant Ave (M)	177/15			NR			NC			
97	1044-1046 Grant Ave	177/16			C			C			
98	1050 Grant Ave	177/17			C			C/a			
99	1056-1066 Grant Ave (R)	177/18			C			NC			
100	603-609 Jackson St	194/34			C			C			

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

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101	604 Jackson St	177/3						x			
102	614-620 Jackson St	177/4			C			C			
103	615-617 Jackson St	194/33			C			C/a			
104	622-624 Jackson St	177/5			C			C/a			
105	626-636 Jackson St	177/6			B*			C/a			
106	627-629 Jackson St	194/32			C			C			
107	631-641 Jackson St	194/31			C**			C			
108	640-648 Jackson St	177/7			C			C			
109	645-649 Jackson St	194/28	1		B			C/a			
110	650-654 Jackson St	177/8			C			C/a			
111	655-657 Jackson St	194/27			C**			C			
112	656-60 Jackson St	177/9			C			C/a			
113	661-665 Jackson St/60-68 Wentworth St	194/26			B			C			
114	662-666 Jackson St	177/10						C			
115	667 Jackson St/65 Wentworth St	194/16			C			C			
116	670 Jackson St	177/11			C			C			
117	675-681 Jackson St	194/18	3					NC			
118	Portsmouth Square (Kearny St)	209				x		x			
119	712-716 Kearny St	208/12			C			C			
120	801-807 Kearny St	194/5A			C	x	4S	C			
121	825 Kearny St	194/5			B			C			
122	827-829 Kearny St (R)	194/4			D			NC			
123	833-839 Kearny St	194/3	3		B			C			
124	847-849 Kearny St	194/2	3		C	x	4S	C/a			
125	Empty Lot	194/1						x			
126	901-931 Kearny St	177/2			C**			C			
127	655 Merchant St	208/10						x			
128	11 1/2 Walter U Lum Pl (Brenham Pl)	209/17						x			
129	15 Walter U Lum Pl (Brenham Pl)	209/16			C			C			
130	17-19 Walter U Lum Pl (Brenham Pl)	209/15			B	x	4S	C/a			

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

		Assessor's Block No. / Lot No.	San Francisco Dept. of City Planning: Inventory	Local Landmark	Foundation for San Francisco's Architectural Heritage	California Inventory of Historic Resources / State Register	National Register of Historic Places	Proposed Chinatown Historic District	Jackson Square Historic District (National Register of Historic Places)	North Beach Survey	
131	21 Walter U Lum Pl (Brenham Pl)	209/14			B	x	4S	C			
132	35 Walter U Lum Pl (M) (Brenham Pl)	209/14						x			
133	49-57 Walter U Lum Pl (Brenham Pl)	209/13			C			C			
134	63 Walter U Lum Pl/727 Washington St	209/12						x			
135	720 Washington St (M)	194/6			NR			NC			
136	728-730 Washington St	194/7			C			C			
137	Empty Lot	194						x			
138	736-738 Washington St	194/8			C			C			
139	731-735 Washington St	209/11			C			C			
140	737-739 Washington St	209/10			C			C/a			
141	740-744 Washington St	194/9			C			C			
142	743 Washington St	209/9	3		A			C			
143	746-750 Washington St	194/11			C			C/a			
144	15-17 Wentworth St	194/22			C			C			
145	19-21 Wentworth St	194/21			C**			C			
146	20-30 Wentworth St	194/23			C			C			
147	32-38 Wentworth St	194/24			C			C			
148	37-39 Wentworth St	194/20						x			
149	40-46 Wentworth St (R)	194/25			NR			NC			

Chinatown Historic District Survey (1983 forms and research)

C = Contributory

C/a = Contributory/altered

NC = Non-contributory

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

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	NORTH OF PROJECT SITE										
150	900 Kearny St (M)	176/11									
151	916 Kearny St-Columbus Tower (Sentinel Bldg) 145-157 Columbus Ave / 935-943 Kearny /	176/13	5	x	A	x	3S		x	x	
152	609 Pacific Ave	177									
153	655 Pacific Ave (M)	177/22									
	SOUTH OF PROJECT SITE (DOWNTOWN)										
154	750 Kearny St (M)	208/24									
155	601 Montgomery St (M) (Site of Pony Express)	208/26				x	7L				
156	655 Montgomery St (M)	208/28									
157	Transamerica Pyramid (M) (Montgomery Block)	207/32				x					
158	505 Sansome St (M) (Niantic Ship/Hotel Site)	207/37				x	x				
159	545 Sansome St (M)	207/35									
160	501-505 Washington St (M?)	207/35									
161	521 Washington St (M?)	207/36									

KEARNY STREET / COLUMBUS AVENUE PROJECT
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	KEARNY ST/COLUMBUS AVE BLOCK PROJECT SITE										
	<i>Colombo Building</i>										
162	1-21 Columbus Ave/612-622 Washington St	195/4	3		B*	x	4S			A	
163	49-55 Columbus Ave	195/12			C		3D (o)			B-	
164	57-67 Columbus Ave	195/16			C**	x	4S			A-	
165	531 Jackson St	195/15			C	x	4S			B	
166	533-555 Jackson St	195/14			C		3D (o)			B	
167	Site A (848 Kearny St. International Hotel)	195				x	1S				
168	636-640 Washington St	195/6			C		3D (o)				
169	642-644 Washington St	195/7			C		3D (o)				
170	646-654 Washington St	195/8			C**		3D (o)				

KEARNY STREET / COLUMBUS AVENUE PROJECT
Zone of Influence Matrix

LEGEND:

- x Property exists under the specific category column
- * Notes that the address is repeated under another street
- M Property was built after 1950
- M? Property was altered or appears modern
- R Property was built before 1950 and remodeled

San Francisco Dept. of City Planning Inventory

1 (lowest), 2, 3, 4, 5 (highest)

Foundation for San Francisco's Architectural Heritage Ratings

A (highest), B, B*, C, C**, D (lowest)

B* = Not eligible for National Register because of alterations or insufficient age

C** = Rating could be upgraded to B if alterations are reversed or more history is known

NR = not rated

National Register of Historic Places

1D = Listed on NR as a Contributor to a listed district

1S = Listed in NR as an individual property

3D = Appears eligible as contributor to a fully documented district.

(o) = This designation represents the evaluator's opinion and the property has not been reviewed by the State Office of Historic Preservation. The property may contribute to either the Jackson Square District or Proposed Chinatown Historic District in the event that a redefining of boundaries occurs.

3S = Appears eligible for listing in NR as a separate property

4S = May become eligible for NR as a separate property

7J = Received by Office of Historic Preservation (OHP)
for evaluation or action but not yet evaluated

7L = Evaluated for a Register other than the National Register (NR)

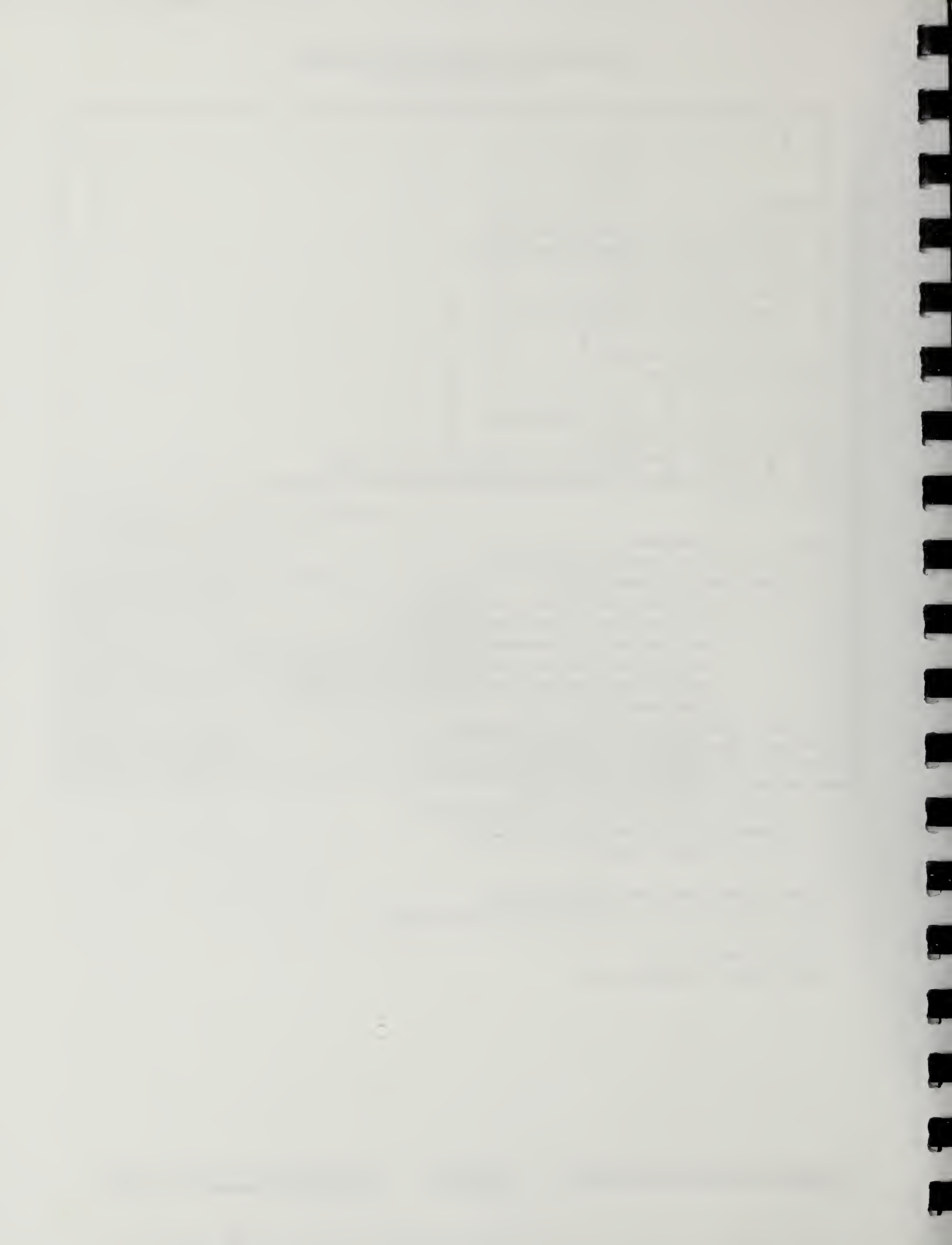
7M = Submitted to OHP for evaluation but not evaluated -
referred to National Park Service

Proposed Chinatown Historic District (1983 forms and research)

C = Contributory, C/a = Contributory/altered, NC = Non-contributory

North Beach Survey (1981 study)

Suggested Ratings: A (highest), A-, B, B-



XI. APPENDICES

Appendix A: Architectural Resources

Appendix B: Wind Survey

Appendix C: Transportation

Appendix D: Air Quality



APPENDIX A: ARCHITECTURAL RESOURCES

The architectural ratings discussed in the text of this report include the results of three separate architectural evaluation surveys: the 1976 San Francisco Department of City Planning Citywide Architectural Survey, the Heritage Survey, and the Unreinforced Masonry Building (UMB) Survey. These are discussed below.

SAN FRANCISCO DEPARTMENT OF CITY PLANNING CITYWIDE ARCHITECTURAL SURVEY

Between 1974 and 1976, the San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings. An advisory review committee of architects and architectural historians assisted in the final determination of ratings for the 10,000 buildings, the results of which were entered in an unpublished 60-volume record of the inventory. The rated buildings are also represented on a set of color-coded maps which identify the location and relative significance of each building surveyed. The inventory and maps are on file at the Department of City Planning.

The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was given two numerical ratings, one for architectural quality and one for overall architectural significance, urban design context, and environmental significance. The latter rating is referred to in this report. The ratings ranged from a low of "0" to a high of "5." The architectural survey resulted in a listing of the best 10 percent of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best 2 percent of the City's architecture.

HERITAGE SURVEY

The Foundation for San Francisco's Architectural Heritage, through its consultants, Charles Hall Page & Associates, Inc., conducted an architectural and historical survey of all downtown structures as well as the Van Ness Corridor, South of Market, North of Market, Civic Center, Chinatown, and currently the Richmond District. In 1979, the original inventory results were published in the book *Splendid Survivors* (Foundation for San Francisco's Architectural Heritage, *Splendid Survivors*, California Living Books, San Francisco, 1979). Criteria considered in rating

the buildings for both surveys include Architectural Significance, Historic context and Negative Alterations. Summary ratings from "A" to "D" were assigned to each building on the basis of these scores. The summary ratings, as described on pages 12 and 13 of *Splendid Survivors*, are listed below:

- A. Highest Importance. Individually the most important buildings in downtown San Francisco, distinguished by outstanding qualities or architecture, historical values, and relationship to the environment. All A-group buildings are eligible for the National Register, and of highest priority for City Landmark status.
- B. Major Importance. Buildings which are of individual importance by virtue or architectural, historic and environmental criteria. These buildings tend to stand out for their overall quality rather than for any particular outstanding characteristics. B-group buildings are eligible for the National Register, and secondary priority for City Landmark status.

The Landmarks Preservation Advisory Board does not distinguish between "A" rated and "B" rated buildings for purposes of preservation.

- C. Contextual Importance. Buildings which are distinguished by their scale, materials, compositional treatment, cornice, and other features. They provide the setting for more important buildings and the add visual richness and character to the downtown area. Many C-group buildings may be eligible for the National Register as part of historic districts.
- D. Minor or No Importance. Buildings which are insignificant examples of architecture by virtue or original design, or more frequently, insensitive remodeling. This category includes vacant buildings and parking lots. Most D-group buildings are sites of opportunity.

Not Rated. Buildings which have been built or suffered insensitive exterior remodelings since 1945.

UNREINFORCED MASONRY BUILDING (UMB) SURVEY

In November of 1990, the Landmarks Preservation Advisory Board completed *A Context Statement and Architectural/Historic Survey of Unreinforced Masonry Building (UMB) Construction in San Francisco from 1850 to 1940*. This survey was adopted by the LPAB at its regular meeting of February 6, 1991, and is available at the Department of City Planning and contains ratings for 2,000 buildings citywide. This project was funded in part, through the National Historic Preservation Fund Grant No. 66-89-40107 by the State Office of Historic Preservation.

NORTH BEACH SURVEY

North Beach San Francisco: An Architectural, Historical, and Cultural Survey was prepared by Anne Bloomfield, Daniel Warner and Nancy Olmsted, and was sponsored by the North Beach Historical Project, Inc. The survey included a visual survey by foot of 1,100 buildings in North Beach, definition of North Beach as opposed to Russian or Telegraph Hills, and an historical account of both the area and certain structures. This survey did not rank individual structures with a letter or number system; rather, it discusses and describes North Beach buildings qualitatively in their architectural, historical and cultural context.

APPENDIX B: WIND STUDY

A wind-tunnel test was performed for the Kearny/Columbus Project, proposed to be located on the block bound by Washington Street, Columbus Avenue, Kearny Street and Jackson Street, in San Francisco, in order to define the pedestrian wind environment that would exist around the proposed project. Pedestrian-level wind speeds were measured at selected points for the site as it presently exists and with the proposed project to quantify resulting pedestrian-level winds in public spaces near the proposed project. In addition, the results were compared with data obtained from a 1985 wind test for a development proposed for the same properties.

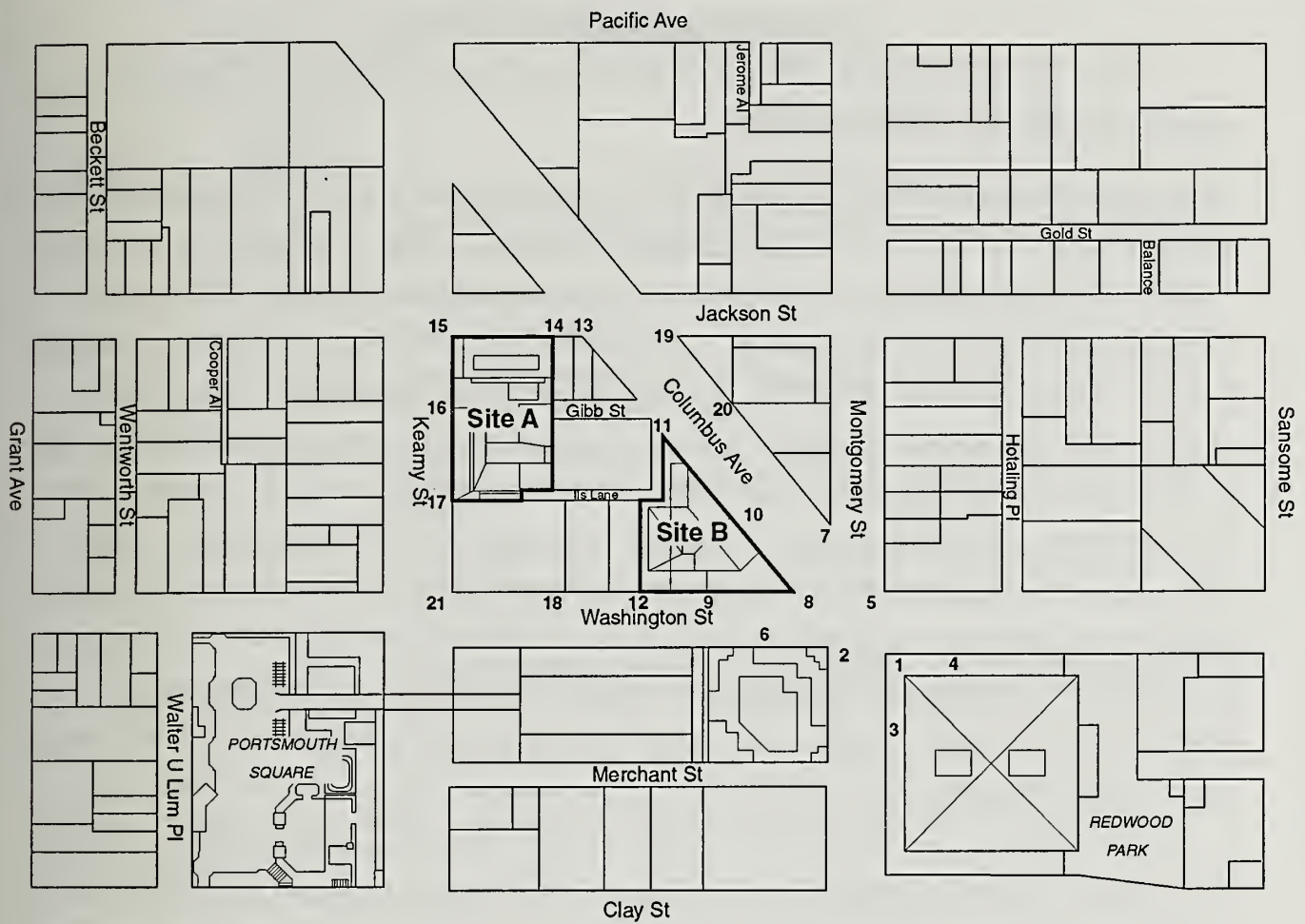
Wind-tunnel testing focused on testing the proposed building design at 13 of the original 21 locations determined to be most impacted by the project. These locations include those along Jackson Street (13, 14, 15, 19), nearby on Kearny Street (16) and Columbus (11, 20, 10, 7, 8), as well as at locations 1, 2, and 5 (see Table B-1, below).

TABLE B-1
PEDESTRIAN COMFORT ANALYSIS - 1996

Existing Conditions			Project Conditions ^a	
Location Number	Pedestrian Comfort Criterion Speed (mph)	Measured Equivalent Wind Speed (mph)	Measured Equivalent Wind Speed (mph)	
1	11	14	13	*
2	11	17 *	16	*
3	11	12 *	--	
4	11	13 *	--	
5	11	12 *	13	*
6	11	15 *	--	
7	11	12 *	8	
8	11	11	16	*
9	11	14 *	--	
10		7	5	
11	11	9	8	
12	11	13 *	--	
13	11	8	14	*
14	11	9	13	*
15	11	9	7	
16	11	6	6	
17	11	7	--	
18	11	9	--	
19	11	8	10	
20	11	9	9	
21	11	9	--	

* Winds exceed criterion speed more than 10 percent of the time.

¹ Only winds from the west-northwest were rerun.



Source: ESA and Bruce White PhD.

LOCATION OF POSITIONS FOR PEDESTRIAN LEVEL WIND SPEED MEASUREMENTS **FIGURE B-1**

APPENDIX C: TRANSPORTATION

LEVEL OF SERVICE DESIGNATIONS

Existing and future traffic conditions at signalized intersections within the primary study area have been evaluated using the TRAF-NETSIM Traffic Simulation Model. Conditions at signalized intersections in the secondary study area have been evaluated using the *1985 Highway Capacity Manual* (Transportation Research Board, 1985) operations methodology. Both methodologies use the concept of Level of Service (LOS), which, for signalized intersections, is defined in terms of delay, or waiting time at a signal. Delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. Intersection LOS, determined according to the vehicle delay in seconds per vehicle, range from LOS A (very low delay) to LOS F (forced flow). Table C-1 (page A.7) provides more detailed descriptions of the six LOS, A through F, for signalized intersections using the *1985 Highway Capacity Manual* method. The TRAF-NETSIM simulation calculates LOS in much the same way, with similar results, but refines the analysis based on signal progression along streets, such as the Embarcadero, and based on spill-back, when queues from one intersection extend back to a previous intersection.

In the past, for planning applications, the City of San Francisco has used a slightly different methodology than the TRAF-NETSIM or *1985 Highway Capacity Manual* to analyze operations at signalized intersections. That method, known as the *Critical Lane Analysis* (Transportation Research Circular Number 212, Transportation Research Board, 1980), determines the ratio of critical opposing traffic volumes to theoretical intersection capacity, yielding the volume-to-capacity (v/c) ratio. Intersection LOS, determined according to the value of the v/c ratio, range from LOS A (free flowing condition) to LOS F (severely congested conditions). Table C-2 (page A.8) provides more detailed descriptions of the six LOS, A through F, for signalized intersections using the *Critical Lane Analysis* methodology.

TABLE C-1
SIGNALIZED INTERSECTION LEVEL OF SERVICE DEFINITIONS BASED ON DELAY

LEVEL OF SERVICE	TYPICAL DELAY (SEC/VEH)	TYPICAL TRAFFIC CONDITION
A	≤ 5.0	Insignificant Delays: No approach phase is fully utilized and no vehicle waits longer than one red indication.
B	5.1 - 15.0	Minimal Delays: an occasional approach phase is fully utilized. Drivers begin to feel restricted.
C	15.1 - 25.0	Acceptable Delays: Major approach phase may become fully utilized. Most drivers feel somewhat restricted.
D	25.1 - 40.0	Tolerable Delays: Drivers may wait through more than one red indication. Queues may develop but dissipate rapidly, without excessive delays.
E	40.1 - 60.0	Significant Delays: Conditions are generally the limit of acceptable delays. Vehicles may wait through several signal cycles and long queues of vehicles from upstream.
F	> 60.0	Excessive Delays: Represents unacceptable conditions with extremely long delays. Queues may block upstream intersections.

Sources: *Highway Capacity Manual*, Highway Research Board, Special Report No. 209, Washington, D.C., 1985; *Interim Materials on Highway Capacity*, Circular 212, Transportation Research Board, 1980; Korve Engineering.

TABLE C-2
ARTERIAL LEVEL OF SERVICE DEFINITIONS BASED ON TRAVEL SPEED

ARTERIAL CLASS	I	II	III
RANGE OF FREE FLOW SPEEDS (mph)	45 to 35	35 to 30	35 to 25
TYPICAL FREE FLOW SPEED (mph)	40	35	27
LEVEL OF SERVICE	AVERAGE TRAVEL SPEED (mph)		
A	≥ 35	≥ 30	≥ 25
B	≥ 28	≥ 24	≥ 19
C	≥ 22	≥ 18	≥ 13
D	≥ 17	≥ 14	≥ 9
E	≥ 13	≥ 10	≥ 7
F	< 13	< 10	< 7

Level of Service A:	Primarily free-flow operations at average travel speeds, usually about 90 percent of the free flow speed for the arterial class. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal.
Level of Service B:	Reasonably unimpeded operations at average travel speeds, usually about 70 percent of the free flow speed for the arterial class. The ability to maneuver within the traffic stream is only slightly restricted and stopped delays are not bothersome. Drivers are not generally subjected to appreciable tension.
Level of Service C:	Stable operations. However, ability to maneuver and change lanes in mid-block locations may be more restricted than in LOS B, and longer queues and/or adverse signal coordination may contribute to lower average travel speeds of about 50 percent of the average free flow speed for the arterial class. Motorists will experience an appreciable tension while driving.
Level of Service D:	Borders on a range on which small increases in flow may cause substantial increases in approach delay and, hence, decreases in arterial speed. This may be due to adverse signal progression, inappropriate signal timing, high volumes, or some combination of these. Average travel speeds are about 40 percent of free flow speed.
Level of Service E:	Significant approach delays and average travel speeds of one-third the free flow speed or lower. Such operations are caused by some combination of adverse progression, high signal density, extensive queuing at critical intersections, and inappropriate signal timing.
Level of Service F:	Extremely low speeds below one-third to one-quarter of the free flow speed. Intersection congestion is likely at critical signalized locations, with high approach delays resulting. Adverse progression is frequently a contributor to this condition.

Source: Highway Capacity Manual, Special Report 209, Transportation Research Board, 1980.

Although the two methodologies for calculating the LOS differ, there is usually a good correlation between the LOS calculated using either method of analysis. It is only when high levels of congestion occur that differences between the two methodologies may be more apparent. As an example, using the *1985 Highway Capacity Manual* methodology, an intersection may be operating at a LOS F, with poor traffic progression, many signal cycle failures and vehicle delays above 60 seconds per vehicle; however, the v/c ratio could be below one, which would mean a LOS E using the *Critical Lane Analysis* methodology. Conversely, using the *1985 Highway Capacity Manual* methodology, an intersection may be operating at LOS D, with an efficient signal progression handling large traffic volumes; however, the v/c ratio could be above 0.9, which would mean a LOS E using the *Critical Lane Analysis* methodology.

PEDESTRIAN ANALYSIS

Pedestrian LOS were calculated using the Pushkarev and Zupan's *Urban Space for Pedestrians* (MIT Press, 1975). For pedestrian crosswalks, pedestrian flow rates, or the number of pedestrians passing a point per unit of time, are the basis for the flow regime designation. The flow rate is calculated using the width of the crosswalk and the number of pedestrians using the crosswalk per peak 15-minute period. Qualitatively, the flow regime indicates the "freedom to choose desired speeds and to bypass others." Table C-3 (page A.10) shows the relationship between pedestrian flow rates and the flow regimes (categories) used to describe levels of operation. Figure C-1 (pages A.11 and A.12) shows photographs of pedestrian conditions that correspond to the flow regimes.

TABLE C-3
PEDESTRIAN FLOW REGIMEN

FLOW REGIME	CHOICE	CONFLICTS	FLOW RATE (p/f/m) ^a
Open	Free Selection	None	less than 0.5
Unimpeded	Some Selection	Minor	0.5 to 2.0
Impeded	Some Selection	High Indirect Interaction	2.1 to 6.0
Constrained	Some Restriction	Multiple	6.1 to 10.0
Crowded	Restricted	High Probability	10.1 to 14.0
<u>Design Limit - Upper Limit of Desirable Flow</u>			
Congested	All Reduced	Frequent	14.1 to 18.0
Jammed	Shuffle Only	Unavoidable	Not applicable ^b

Notes: ^a p/f/m = Pedestrians per foot of effective sidewalk width per minute.

^b For Jammed Flow, the (attempted) flow rate degrades to zero at complete breakdown.

Source: *Urban Space for Pedestrians*, MIT Press, 1976, Cambridge, MA.

JAMMED FLOW. Space per pedestrian in this view is about 3.8 sq ft (0.35 m²). This is representative of the lower half of the speed-flow curve, where only shuffling movement is possible and even the extremely un-

comfortable maximum flow rate of 25 people per min per ft (82 per m) of walkway width cannot be attained due to lack of space. Photograph by Louis B. Schlivek.



The threshold of **CONGESTED FLOW**. The first eleven people in the view have about 16 sq ft (1.5 m²) per person, corresponding to a flow rate of about 15 people per min per ft (49 per m) of walkway width. The beginnings of congestion are evident in bodily conflicts affecting at least three of the walkers, and in blocked opportunities for walking at a normal pace.

The onset of **CROWDED FLOW**, with an average of about 24 sq ft (2.2 m²) per person, or a flow rate of about 10 people per min per ft (33 per m) of walkway width. Choice of speed is partially restricted, the probability of conflicts is fairly high, passing is difficult. Voluntary groups of two, of which two can be seen in the picture, are maintained, but cause interference. Note also some overflow into the vehicular roadway in the background.

The midpoint of the **CONSTRAINED FLOW** range, with about 30 sq ft (2.8 m²) per person, or a flow rate of about 8 people per min per ft (26 per m) of walkway width. The choice of speed is occasionally restricted, crossing and passing movements are possible, but with interference and with the likelihood of conflicts. The man in the dark suit seems to be able to cross in front of the two women in the foreground quite freely, but in the background near the curb people are having difficulty with passing maneuvers.

Source: Pushkarev and Zupon

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PHOTOS OF PEDESTRIAN FLOWS

FIGURE C-1



The borderline between IMPEDED and UNIMPEDED FLOW, with about 130 sq ft (12 m²) per person, or a flow rate of about 2 people per min per ft (6.5 per m) of walkway width. Individuals as well as couples visible in this view have a choice of speed and direction of movement. This rate of flow is recommended for design of outdoor walkways in office districts and other less dense parts of downtown areas.



The midpoint of the IMPEDED FLOW range, with about 75 sq ft (6.9 m²) per person, or a flow rate of about 4 people per min per ft (13 per m) of walkway width. Physical conflicts are absent, but pedestrian navigation does require constant indirect interaction with others. This rate of flow is recommended as an upper limit for the design of outdoor walkways in shopping districts and other dense parts of downtown areas.



The uneven nature of UNIMPEDED FLOW. While the people walking in the plaza—which is 17 ft (5.2 m) wide, compared to 23 ft (7 m) in the preceding picture—have almost 130 sq ft (12 m²) per person on the average, the space allocation for the eight individuals in the foreground is closer to 70 sq ft (6.4 m²). Thus, indirect interaction with others is still quite frequent in the upper range of UNIMPEDED FLOW.



Lower range of UNIMPEDED movement, approaching OPEN FLOW. About 350 sq ft (32.2 m²) per person, or a flow rate of less than 1 person per min per ft (3.3 per m) of walkway width. Complete freedom to select the speed and direction of movement; individuals behave quite independently of each other. For a design standard based solely on pedestrian density, this amount of space can be considered excessive.

APPENDIX D: AIR QUALITY

TABLE D-1
SAN FRANCISCO AIR POLLUTANT SUMMARY, 1991-1994^b

POLLUTANT	STANDARD	Monitoring Data by Year ^d			
		1991	1992	1993	1994
OZONE (O ₃)					
Highest 1-hr average, ppm ^b	0.09 ^c	0.05	0.08	0.08	0.06
Number of standard excesses		0	0	0	0
CARBON MONOXIDE (CO)					
Highest 1-hr average, ppm	20.0 ^c	8.0	8.0	7.0	8.0
Number of standard excesses		0	0	0	0
Highest 8-hr average, ppm	9.0 ^c	6.4	5.0	4.4	4.4
Number of standard excesses		0	0	0	0
NITROGEN DIOXIDE (NO ₂)					
Highest 1-hr average, ppm	0.25 ^c	0.09	0.08	0.05	0.09
Number of standard excesses		0	0	0	0
SULFUR DIOXIDE (SO ₂)					
Highest 1-hr average, ppm	0.25 ^c	0.011	0.012	0.005	0.005
Number of standard excesses		0	0	0	0
PARTICULATE MATTER (PM-10)					
Highest 24-hr average, ug/m3	50 ^c	<u>109</u>	<u>81</u>	<u>69</u>	<u>93</u>
Number of standard excesses ^e		15	9	5	6
Annual Geometric Mean, ug/m3	30 ^c	29.6	27.6	25.1	24.7
LEAD					
Highest 30-day average, ug/m3	1.5 ^d	0.05	0.02	0.02	0.03
Number of standard excesses		0	0	0	0

Underlined values indicate violation of standards.

Notes: ^a CO data were collected at the BAAQMD monitoring station at 939 Ellis Street: all other data were collected at the Arkansas Street Station.

^b ppm = parts per million; ug/m3 = micrograms per cubic meter.

^c State standard, not to be exceeded.

^d State standard, not to be equalled or exceeded.

^e Measured every sixth day.

Source: California Air Resources Board, *California Air Quality Data*, Vols. XXIII-XXVI, 1992-1995.



